Case: 4:22-cv-00035-SRC Doc. #. 17-11 Filed: 09/08/22 Page: 1 of 119 PageID #: 420

CHARGE OF DISCRIMINATION	Tuesday and the	MEN AND DESIGNATION OF THE PERSON OF THE PER	10 4 1 1 10 3 3 2 10 9 1 4 10 4 V V V V V	
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301 N. 11 <sup>th</sup> Street Sal	nt Louis, MO 63		CRIMINATION LODGERATE	
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MISSOURI COMMISSION ON HUMAN RIGHTS Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 2 of 119 PageID

EEOC FORM 131-A (11/09)

### U.S. Equal Employment Opportunity Commission

		PERSON FILING CHARGE				
I		Paul Perniciaro				
		THIS PERSON (check one or both)				
		<del>                                   </del>				
		X Claims To Be Aggrieved				
	JBLIC SCHOOLS	Is Filing on Behalf of Other(s)				
801 N. 11th Stree Saint Louis, MO		EEOC CHARGE NO.				
		28E-2022-00122				
		FEPA CHARGE NO.				
<u> </u>		E-10/21-53410				
NOTICE OF	CHARGE OF DISCRIMINATION IN JURISDICTION W (See the enclosed for additional inform					
THIS IS NOTICE T	HAT A CHARGE OF EMPLOYMENT DISCRIMINATION UN	DFR				
	ne Civil Rights Act (Title VII) The Equal Pay Act (EPA)	The Americans with Disabilities Act (ADA)				
The Age Dis	crimination in Employment Act (ADEA)	c Information Nondiscrimination Act (GINA)				
HAS BEEN RECEI	VED BY					
The EEOC an	d sent for initial processing to					
		(FEP Agency)				
X The Misso	uri Commission On Human Rights	and sent to EEOC for dual filing purposes.				
	(FEP Agency)					
charge, EEOC may orders will be given	While EEOC has jurisdiction (upon expiration of any deferral requirement if this is a Title VII, ADA or GINA charge) to investigate this charge, EEOC may suspend its investigation and await the issuance of the Agency's final findings and orders. These findings and orders will be given weight by EEOC in making its own determination as to whether reasonable cause exists to believe that discrimination has occurred.					
considered by EEO	encouraged to cooperate fully with the Agency. All facts and each of when it reviews the Agency's final findings and orders. In sity of an investigation by both the Agency and EEOC. This	many cases EEOC will take no further action, thereby				
For such a request order. If the Agency Regardless of whet	large, you may request that EEOC review the final findings a to be honored, you must notify EEOC in writing within 15 day terminates its proceedings without issuing a final finding an ther the Agency or EEOC processes the charge, the Recording enclosed information sheet apply.	ys of your receipt of the Agency's final decision and dorder, you will be contacted further by EEOC.				
For further correspond	ondence on this matter, please use the charge number(s) sh	own above.				
Enclosure(s): Copy	y of Charge					
CIRCUMSTANCES OF	F ALLEGED DISCRIMINATION					
Race Color	Sex X Religion National Origin Age Disa	bility Retaliation Genetic Information Other				
See enclosed copy of charge of discrimination.						
Date	Name / Title of Authorized Official	Signature				
November 4, 2021	Lloyd J. Vasquez, Jr., District Director					

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#### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Ente	r Charge Number
	FEPA
$\boxtimes$	EEOC.560-2012-00358

Missouri Commission on Human Rights and EEOC						
Name (Indicate Mr., Ms., or M Ms. Alice Crockett	rs.)		Date of Birth	Ho	me Telep	phone No. (Include Area Code)
Street Address		City, Sta	te and Zip Coo	le		County
	Employer, Labor Orgovernment Agency v					enticeship, Committee, than one list below).
Name Saint Louis Public School	District		No. of Emplo 500+	yees/Members	Telepho 314-23	ne No. (Include Area Code) 1-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State an Saint Louis	nd Zip Code , MO 63101		
Name Board of Education of the	City of St. Louis		No. of Emplo 500+	yees/Members	Telepho 314-23	ne No. (Include Area Code) 1-3720
Street Address 801 N. 11th Street			City, State and Saint Louis	nd Zip Code , MO 63101	<u> </u>	
Cause of Discrimination base Race National Origin Disability	d on (Check appropriate box(c	es)) Sex Age Other (Spec	if./)		(1	Date Discrimination took Place Month, Day, Year) August 2021-Present  Continuing Action
The Particulars Are (If additional space is needed, attach extra sheat(s)):  I have worked for the Board of Education of the City of St. Louis & Saint Louis Public School District since 2001. I am a tenured certified teacher in the district.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  I applied for a religious exemption including supplying written statements outlining by beliefs by myself and my pastor. The request for an exemption was denied by the district. I asked for reasons for the denial and for an outline of how the district evaluated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether their was a review process. The district refused to provide me answers to my questions.  Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions.  I spoke at a board of education meeting on October 12, 2021 regarding myself and other employees of the district to seek the district to amend their COVID policy. I indicated that frequent testing was a viable alternative to termination of employees who were not vaccinated and discussed that other districts have adopted frequent testing of non vacinnated staff. I also addressed the staffing shortages that were present in the district which are contrary to the welfare of the children and funding guidelines. Accommodating teachers by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties.  The Superintendent of Sc						
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)  NOTARY – (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.  Signature of Gorpolainant  KEVIN KASPER/  Subscriber to Sworn to before me this date (Pay, month and Year)  St. Charles County						
The state of the s		10/	2	Comm My Commis	ission #	15386761 MCHF 27 (4-99)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 4 of 119 PageID

actions seeking an exemption and testifying at the board meeting in opposition to the district and boards' discriminatory policies. The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, in-cluding but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct.  X Llu B. (Nockett) 11/3/2/ Charging Party (Signature) Date	Subscribed and sworm to before the Nil Add Paper, month and Tear)
7. 0	State of Missouri St. Charles County  MCMR-27-2

IR-27-2 AI

Commission # 15386761 My Commission Expires 09-30-2023

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### **CHARGE OF DISCRIMINATION**

Ente	r Charge Number	
	FEPA	
$\boxtimes$	EEOC 560-2022-0016	7

This form is affected by the Privacy Act of 1974;			leung this form.	
Missouri Commission	on Human Rights ar	d EEOC		
Name (Indicate Mr., Ms., or Mrs.) Ms. Amira Herndon	Date of Birth	Home Te	elephone No. (Include Area Code)	
Street Address City	y, State and Zip Code		County	
Named below is the Employer, Labor Organization State or Local Government Agency who disc				
Name Saint Louis Public School District	No. of Employees/Mer 500+	No. of Employees/Members Telephone No. (Include Area Code, 314-231-3720		
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Co Saint Louis, MO 63			
Name Board of Education of the City of St. Louis	No. of Employees/Mer 500+		hone No. (Include Area Code) 231-3720	
Street Address 801 N. 11th Street	City, State and Zip Co Saint Louis, MO 63			
Cause of Discrimination based on (Check appropriate box(es))  Race  Color  Sex			Date Discrimination took Place (Month, Day, Year)	
National Origin Religion Age		!	August 2021-Present	
Disability Retaliation Other ( The Particulars Are (If additional space is needed, attach extra sheet(s)	Specify)		Continuing Action	
I have worked for the Board of Education of the City of St. Louis & Saint Louis Public School District since 1998. I am a tenured certified teacher in the district.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  I applied for a religious exemption. The request for an exemption was denied by the district.  It is my understanding that the district has refused all requests for religious exemption. The district has not given reasons for the denials other than boilerplate rhetoric and has refused to provide an outline of how the district evaluated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process. Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us have been approved for an exemption.  The Superintendent of Schools for the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.  The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialous to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and boards discriminatory policies.  The district and board have engaged in a p				
I want this charge filed with both the EEOC and the Misso Commission on Human Rights. I will advise the agencies if I change address or telephone number and I will cooperate fully with them in processing of my charge in accordance with their procedures.	my Canal	ave read the a	above charge and that it is true to and belief.	
Charging Party (Signature)  AMANDA L. MILLER  Notary Public - Notary St. Charles County - State of M  Commission Number 13534  My Commission Expires Oct 6	1807	2931	MdM 11/9/303/	
My Commission Expires occ o	1 of 2 11	NON I	15 9 MCHR-27 (4-99) AI	

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 6 of 119 PageID

their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the	1 101	x Mulas Aleman 11/9/202 Singature of Complainant
Charging Party (Signature)	SELVIM ANNA	1 Nov 2021
	Commission Number 135348 My Commission Expires Oct 6,	107

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### **CHARGE OF DISCRIMINATION**

Enter Charge Number
FEPA
■ EEOC 560-2021-02640

This form is affected by the Privacy Act of 1974; see Privacy Act Statement before completing this form

discharged from my employment with the St. Louis Public Schools.  The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and board have engaged in a pattern and practice of discriminatory policies.  The district and board have engaged in a pattern and practice of discriminatory policies.  The district and board have engaged in a pattern and practice of discriminatory policies.  I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  AMANDA L. MILLEPate Notary Seal St. Charles County State of Missouri Commission Number 13514807	This form is an ected by the Privacy Act of 1514, See Privacy Act Statement before completing this form.						
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).  Name Saint Louis Public School District    No. of Employees/Members   Telephone No. (Include Area Code)   314-231-3720	Missouri Commission on Human Rights and EEOC						
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (iff more than one list below).  Name Saint Louis Public School District    No. of EmployeesMembers   Telephone No. (Include Area Code) 314-231-3720		5.)			Date of Birth	Home T	elephone No. (Include Area Code)
State or Local Government Agency who discriminated against me (if more than one list below).  Name   No. of Employees/Members   Telephone No. (Include Area Code)   314-231-3720   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Same   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   State and 2ip Code   City. State and 2ip Code   Saint Louis, MO 63101   State and 2ip Code   City. State and 2ip Code   Saint Louis, MO 63101   State	Street Address			City, Stat	e and Zip Code		County
State or Local Government Agency who discriminated against me (if more than one list below).  Name   No. of Employees/Members   Telephone No. (Include Area Code)   314-231-3720   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Same   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   Street Address   City. State and 2ip Code   Saint Louis, MO 63101   State and 2ip Code   City. State and 2ip Code   Saint Louis, MO 63101   State and 2ip Code   City. State and 2ip Code   Saint Louis, MO 63101   State							
Saint Louis Public School District    Street Address							
Saint Louis, MO 63101  Name Board of Education of the City of St. Louis  Signet Address  City, State and Zip Code Saint Louis, MO 63101  Cause of Discrimination based on (Check appropriate box(es))  Race  Color  Sex  National Origin  Relajion  Relajion  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  National Origin  National Origin  Relajion  Other (Specify)  Date Discrimination took Place (Month, Day, Year)  National Origin  Nation		District					
Street Address Street Address Sol N. 11th Street  Cause of Discrimination based on (Check appropriate box(as))  Race   Race   Color   Sex   Autonal Origin   Religion   Age   Age   August 2020121-Present   August 2020121-P							
Bank 1.11th Street  Cause of Discrimination based on (Check appropriate box(es))  Race  Oolor  Religion  Disability  Religion  Disability  Religion  Disability  Religion  Disability  Religion  The Particulars Are (if additional space is needed, attach extra sheet(s)):  The very relicular and the district.  On August 22, 2021 the Board of Education of the City of St. Louis & Saint Louis Public School District since 2012. I am a tenured cartified teacher in the district.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  I applied for a religious exemption including supplying written statements outlining by beliefs by myself, my pastor and a member of my church. The request for an exemption was denied by the district.  It is my understanding that the district has refused all requests for religious exemption. The district has not given reasons for the denials other than bollerplate retoric and has refused to provide an outline of how the district was a review process.  Other district in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. The district was requested to the district and the people who have requested religious exemptions. The district was refused to endage in the re		City of St. Louis			' *		
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Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  Charging Party (Signature)  AMANDA L. MILLEBate Notary Public - Notary Seal St. Charles County State of Missouri Commission Number 13534807	certified teacher in the district.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  I applied for a religious exemption including supplying written statements outlining by beliefs by myself, my pastor and a member of my church. The request for an exemption was denied by the district.  It is my understanding that the district has refused all requests for religious exemption. The district has not given reasons for the denials other than boilerplate retoric and has refused to provide an outline of how the district evaluated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process.  Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us have been approved for an exemption.  I filed an internal discrimination complaint on September 29, 2021 for the districts discrimination against me because of my sincerely held religious belief. The district did not repond to my complaint of discrimination.  The Superintendent of Schools for the district, Kelvin Adams, issued me a "Statement of Charges and Notice of Hearing" on October 20, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to pos						
Charging Party (Signature)  AMANDA L. MILL EPate Notary Public - Notary Seal St Charles County - State of Missouri Commission Number 13534807  Signature of Complainant  Signature of Complainant  Subscribed and sworn to before me this date (Day, month and Year)	Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my change in accordance with their procedures.				above charge and that it is true to		
My Commission Expires Oct 6, 2025	Charging Party (Signature)  AMANDA L. MILLEBate Notary Public - Notary Seal St Charles County State of Missouri Commission Number 13534807				this date (Day, month and Year)		

ST. LOUIS IT: II. C.

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 8 of 119 PageID

#: 427

and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with reliegious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		Charlof Mile	
AMANDA L. MILLER		Signature of Complainant  8 Novancher 2021  Substituted and sworn to before me this date (Day, month and Year)	
	Notary Public - Notary Seal St Charles County - State of Mis Commission Number 135348	issouri - C	

My Commission Expires Oct 6, 2025



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

Enter Charge Number 7 FEPA

ST. LOUIS DE TRUET

Missouri Commission on Human Rights and EOC  Mr. Johnnie McCreary  Steek Address  City. State and Zo: Gode  State or Local Government Agency who discriminated against me (if more than one tist below).  State or Local Government Agency who discriminated against me (if more than one tist below).  State or Local Government Agency who discriminated against me (if more than one tist below).  Sine Louis Public School District  No. of EmployeesMembers Sine Address  City. State and Zo: Code  City. State and Zo: Code  City. State and Zo: Code  Saint Louis. MO 63101  No. of EmployeesMembers Sine Address  City. State and Zo: Code  City. State an	This form is affected by the Privacy Act of 1974.		Ø	EEOC 540-2022-0015 (		
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (iff more than one list below). Saint Louis Public School District	Missouri Commission	e Privacy Act Statement befor		pleting this form.		
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, Saint Louis Public School District   No of Employees/Members   Telephone No, (Include Area Code)	Mr. Johnio Mr. and Rights and EEOC					
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).  Saint Louis Public School District    No. of Employees/Members   Steephone No. (Include Area Code)	Street Address	Date of Birth				
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Saint Louis Public School District    No. of Employees/Members   Telephone No. (Include Area Code)	Named below is the Employee			County		
Saint Louis Public School District    No. of Employees/Members   Telephone No. (Include Area Code)	State or Local Government A property of the Employer, Labor Organization,	<b>Employment Agency</b>	Ann	ronticocki		
Saint Louis Public School District    No. of Employees/Members   Telephone No. (Include Area Code)	Name	inated against me (if	more	than one list below		
Site I Address Sol 1 N. 11th Street Saint Louis, MO 63101  No of Employees/Members Telephone No. (Include Area Code) Street Address B01 N. 11th Street Street Address B01 N. 11th Street City, State and Zip Code Saint Louis, MO 63101  Cause of Discrimination based on (Check appropriate box(es)) Race Saint Louis, MO 63101  Cause of Discrimination based on (Check appropriate box(es)) Race National Origin Religion Age August 2020121-Present Disability Retailation Other (Specify) Sex August 2020121-Present Disability Retailation Other (Specify) Continuing Action The Particulars Are (if additional space is needed, attach extra shee(s)): Have worked for the Board of Education of the City of St. Louis & Saint Louis Public School District since 1983. I am a tenured certified teacher in the district, On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious betiefs. It is my understanding that the district has refused all requests for religious exemption. The district can be district. It is my understanding that the district has refused all requests for religious exemption. The district as review process. Other districts in the State of Missouri have implemented provide an outline of how the district evaluated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process. Other district in the State of Missouri have implemented provide an outline of how the district valuated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process. Other district in the State of Missouri have implemented provide an outline of how the district valuated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process. Other district in the State of the district on the state of the		No, of Employees/Members	Teleph	none No. (Include Area Code)		
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denials other than boilerplate rhetoric and has refused to provide an outline of how the district evaluated religious exemption requests, what their criteria was, who reviewed the request for religious exemptions and whether there was a review process. Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to leach, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialog with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us have been approved for an exemption.  The Superintendent of Schools for the district, Ketvin Adams, issued me a "Statement of Charges and Notice of Hearing" on October 19, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.  The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and boards' discriminatory policies.  The district and board have engaged in a pattern and practice of discrimination policies.  The district and board have engaged in a pattern and practice of discrimination applicates and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated	I applied for a religious exemption. The request for an exemption vitris my understanding that the district has refused all requests for re	vas denied by the district. Higious exemption. The dis	strict ha	as not given reasons for the		
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employees of the district who have requested exemptions and none of us have been approved for an exemption. The Superintendent of Schools for the district, Kelvin Adams, issued me a "Statement of Charges and Notice of Hearing" on October 19, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools. The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and boards discriminatory policies.  The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about  I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  Notary Public - Notary Seal  Notary Public - Nota	continue to teach, however the district has refused to enterial sucr interactive dialog with me and other people who have requested rel	i accommodations. The dist igious exemptions. Thave s	ıncı nas spoken	with numerous other		
19, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools. The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and boards' discriminatory policies. The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about    I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.    NOTARY - (When necessary to meet State and Local Requirements)	employees of the district who have requested exemptions and none	of us have been approved to	for an e	exemption.		
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as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption and complaining about the district and boards' discriminatory policies.  The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about  I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  AMNDA L. MILLER Charge filed work their procedures.  AMNDA L. MILLER Charge filed work their procedures.  AMNDA L. MILLER Charge filed work their procedures and that it is true to the best of my knowledge, information and belief.  AMNDA L. MILLER Charge filed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	discharged from my employment with the St. Louis Public Schools.					
The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about    I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.    I declare under penalty of perjury that the foregoing is true and correct.   Notary Public - Notary	as to possible accommodations of my beliefs that would allow me to	continue working. They ha	ave also	retaliated against me for my		
and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about    I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.    I declare under penalty of perjury that the foregoing is true and correct.   Notary Public - Notary Seat   Notary Public - Notary Seat   St harles County - State of Missperibl cribed and sworn to before me this date (Day, month and Year)   Commission Number 13534807	actions seeking an exemption and complaining about the district an	d boards' discriminatory poli	icies. ees her	cause of their religious beliefs		
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  Charging Party (Signature)  AMINDAL, MILLER Notary Public - Notary Seat State of Missperible cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	and of retaliating against persons who complain about such discrim	ination. The district and bo	ard hav	e knowingly and intentionally		
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  Charging Party (Signature)  AMINDAL, MILLER Notary Public - Notary 3 eat St. harles County - State of Missperible cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	discriminated against me, and other employees because of our religions and District has retained against me and other	gious beliefs resulting in bott persons seeking religious e	h dispa exempti	rate treatment and disparate ons and for complaining about		
Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  AMANDAL, MILLER Notary Public - Notary Seal St wharles County - State of Missperible cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807						
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  Charging Party (Signature)  Advinda L. Miller Notary Public - Notary State of Missperible cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807		(man	1	16		
Charging Party (Signature)  AMINDAL, MILLER Notary Public - Notary State of Missperiols Cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	address or telephone number and I will cooperate fully with them in the I swear or affirm that I have read the above charge and that it is true to					
Charging Party (Signature)  AMANDA L. MILLER Notary Public - Notary Seal St Charles County - State of Misspendo cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807		the best of my knowledge, info	mation	and belief.		
Charging Party (Signature)  Addining E. Milling  Notary Public - Notary Seal  St Charles County - State of Missperiol Cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	I declare under penalty of perjury that the foregoing is true and correct	Shan QIA	VIYO	DA DIL 1-9-21		
Charging Party (Signature)  Addining E. Milling  Notary Public - Notary Seal  St Charles County - State of Missperiol Cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	(3/ min & MC MC 2001 1 - 16 2-21 - 1	X ATTIVITY OF Complainant	ЦМ	WILL TO THE STATE OF THE STATE		
St Charles County - State of Missperible Cribed and sworn to before me this date (Day, month and Year)  Commission Number 13534807	Charging Party (Signature)		211	2		
	1 St Wharles County - State of Miss	on b cribed and sworn to before		is date (Day, month and Year)		
	Commission Number 1353480	025 CZ	l M	3V 1 3 (MCHR-27 (4-99) A		

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their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Charging Party (Signature)

AMANDA L. MILLER Date Notary Public - Notary Seal

Charles County - State of Missouri Commission Number 13534807 My Commission Expires Oct 6, 2025

NOTARY - (Where necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief

nature of Complainant

NOV 202 (

ubscribed and sworn to before me this date (Day, month and Year)

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	er Charge Number
	FEPA
$\boxtimes$	EEOC 560-2622-00857

Missouri Co	mmission on	Human Rights	and EEC	OC
Name (Indicate Mr., Ms., or Mrs.) Ms. Ashley Moore		Date of Birth	Hom	e Telephone No. (Include Area Code)
Street Address	City, Sta	ate and Zip Code		County
Named below is the Employer, Labor State or Local Government Agenc	Organization, y who discrim	Employment A	gency, A me (if m	apprenticeship, Committee ore than one list below).
Name Saint Louis Public School District		No. of Employees/N 500+	lembers T	elephone No. (Include Area Code) 14-231-3720
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip 6 Saint Louis, MO 6		
Name Board of Education of the City of St. Louis		No. of Employees/N 500+		elephone No. (Include Area Code) 14-231-3720
Street Address 801 N. 11th Street		City, State and Zip of Saint Louis, MO 6		
Cause of Discrimination based on (Check appropriate b	oox(es))			Date Discrimination took Place (Month, Day, Year)
✓ National Origin     ✓ Religion       ✓ Disability     ✓ Retaliation	Age Other (Spe	cify)		August 2021-Present  Continuing Action
similar exemptions from universities and a statem. The district did not grant any religious exemption. Other districts in the State of Missouri have imple are able to continue working and teaching such a available to allow me to continue to work, however refused to engage in an interactive dialogue with numerous other employees of the district who have Accommodating teachers and employees by allow best interests of all parties. The district has approaccommodations available that would allow the tereligious exemptions. Upon reason and belief the blanket denials to all request in violation of our control of the district and board have discriminated against dialogue as to possible accommodations of my befor my actions seeking an exemption.	requests. mented procedure is frequent COVID er the district has r me and other peo we requested exen wing frequent testi oved medical exer eacher to teach an e district did not ac onstitutional and st 1, 2021. St. Louis t me because of m	es where employees testing. This indica efused to entertain sple who have requentions and none of any rather than terminations for other tead the students to lead the students to lead tutory rights.  Se Public Schools terminations beliefs in the students to lead the students the students to lead the st	and teach tes that the such accon sted religio us have be nating then chers which arn, but the quest for re minated me cluding ref	ers without COVID-19 vaccination are are accommodations that are modations. The district has us exemptions. I have spoken where approved for an exemption, in would be reasonable and in the challenge of the indicates that there are district has refused to grant any ligious exemption and issued a on October 16, 2021.
I want this charge filed with both the EEOC Commission on Human Rights. I will advise the agenc address or telephone number and I will cooperate full processing of my charge in accordance with their processing of the my charge in accordance with the my charge in accordance w	cies if I change my ly with them in the edures.		I have read	the above charge and that it is true to ation and belief.
Charging Party (Signature)  Notary	Lacaa EVIN KASPBRE	Signature of Compi	1/16/2	TUZZ me this date (Day, month and Year)
JAN 10 2022 St. Commi	te of Missouri Charles County ssion # 1538676 sion Expires 09-3	51	1-Z	MCHR-27 (4-99

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#: 431

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



I want this charge filed with both the Commission on Human Rights. I will advise the		NOTARY – (When necessary to meet State and Local Requirements)			
address or telephone number and I will coope processing of my charge in accordance with the		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.			
X Charging Party (Signature)	1/6/2022	X Signature of Complainant /// 1-6-2022			
Charging Party (Signature)	KEVIN K	Sibscribed and sworn to before me this date (Day, month and Year)			
	State of St. Charle Commission E	Missouri 9s County # 15386761 MCHR-27-2 AI			

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
$\boxtimes$	EEOC 360-2022-01130	,

Name (Indicate Mr., Ms., or		iri Commissio	on on Human Rights	and EEO	3
Ms. Angel Scott		Date of Birth	Home	Telephone No. (Include Area Code)	
Street Address			City, State and Zip Code		County
Named below is the State or Local (	Employer, La	abor Organiza gency who di	ation, Employment A	Agency, Ap	oprenticeship, Committee,
Name Saint Louis Public School	District		No. of Employees 500+		lephone No. (Include Area Code) 4-231-3720
Street Address 801 N. 11th Street			City, State and Zip Saint Louis, MO		
Name Board of Education of the	City of St. Louis		No. of Employees 500+		lephone No. (Include Area Code) 4-231-3720
Street Address 801 N. 11th Street			City, State and Zip Saint Louis, MO		
Cause of Discrimination bas Race National Origin Disability	ed on (Check appro Color Religion Retaliation	Sex Age	er (Specify)		Date Discrimination took Place (Month, Day, Year) August 2020121-Present Continuing Action
continue teaching such a continue to teach, however interactive dialogue with employees of the district Accommodating teachers best interests of all parties accommodations availablearn, but the district has request for religious exern the district suspended material received a call on October 2021. They called me at allegedly violating policy. The certified teachers we employees such as myses	is frequent COVID are the district has me and other people who have request and employees best. The district has the that would allow refused to grant a mption and issued the with pay on Octor 20, 2021 and was work and told me are given statement of were terminated strict reversed its filled with both the lifts. I will advise the per and I will cooper accordance with their	testing. This ind refused to entertaple who have requested exemptions are approved medically religious exemplated exemptions exemplated exemptions exemplated exemptions exemplated exempla	icates that there are accomin such accommodations uested religious exemptioned none of us have been a cent testing rather than termical exemptions for other end employees to teach and aptions. Upon reason and all request in violation of t. Louis Public Schools this take and that I should go office. They terminated suspended without pay provide the statement of charging many in the	mmodations to The district ins. I have spapproved for a minating them imployees which perform their is belief the district constitution terminated to back to work me a second ending hearing the mecessary to me at I have read the	would be reasonable and in the ch indicates that there are duties and for the students to trict did not actually review my onal and statutory rights.  me on October 16, 2021. It. I went to work on October 20, time on October 21, 2021 for gs to terminate them. Noncertified a certified teachers in January set State and Local Requirements)
			ect.	4	

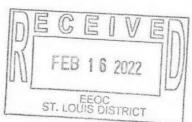
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2022. They also rehired several of the noncertified employee's whom they had previously terminated when their requests for religious exemptions were denied. The district has agreed to grant the certified teachers' and several noncertified teacher's religious exemptions of twice per week testing. This is an indication that the accommodation is available without undue cost to the district. The district and board has discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about

their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



Commission on Human Rights. I will ad		NOTARY – (When necessary to meet State and Local Requirements)			
address or telephone number and I will processing of my charge in accordance		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.			
I declare under penalty of perjury that the	e foregoing is true and correct.	X Signature of complainant			
Charging Party (Signature)	Notary Public,	SPER SPER and sworn to before me this date (Day, month and Year)			
	State of M St. Charles Commission	s County			

My Commission Expires 09-30-2023

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## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	er Charge Number
	FEPA
$\boxtimes$	EEOC 560-2022-01112

	n on Human Rights and	EEOC	
Name (Indicate Mr., Ms., or Mrs.) Mr. Nicholas Williams	Date of Birth	Home Tele	ephone No. (Include Area Code)
Street Address	City, State and Zip Code		County
Named below is the Employer, Labor Organiza State or Local Government Agency who dis			
Name Saint Louis Public School District	No. of Employees/Memb 500+	The state of the s	one No. (Include Area Code) 31-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 6310		
Name Board of Education of the City of St. Louis	No. of Employees/Memb 500+		one No. (Include Area Code) 31-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 6310		
Cause of Discrimination based on (Check appropriate box(es)).  Race Color Sex National Origin Religion Age	r (Specify)		Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action
Custodian.  On August 24, 2021 the Board of Education adopted a policy requirement conflicts with my sincerely held religious beliefs. I applied for a religious exemption including supplying a written The request for an exemption was denied by the district.  The St. Louis Public Schools terminated me on October 15, 20 Other districts in the State of Missouri have implemented procontinue teaching such as frequent COVID testing. This indication to teach, however the district has refused to entertainteractive dialogue with me and other people who have requemployees of the district who have requested exemptions an	en statement outlining my belie 2021 for allegedly violating boa cedures where teachers witho cates that there are accommodin such accommodations. The tested religious exemptions.	efs including ard policy. ut COVID-1: dations that e district has I have spoke	9 vaccinations are able to are available to allow me to refused to engage in an en with numerous other
The certified teachers were given statement of charges and semployees such as myself were terminated.  The district reversed its policy and withdrew the statement of agreed to grant the certified teachers' religious exemptions of available without undue cost to the district.	charges against the certified t f twice per week testing. This	eachers in . is an indical	January 2022. The district has tion that the accommodation is
The district offered me to be reinstated on January 29, 2022.  I want this charge filed with both the EEOC and the Mic Commission on Human Rights. I will advise the agencies if I chang address or telephone number and I will cooperate fully with them processing of my charge in accordance with their procedures.	ssouri ge my	sary to meet : ve read the ab	State and Local Requirements)  bove charge and that it is true to
DECEIVED Notary Put State St. Che Commissi		Will 1 2/8	3/22

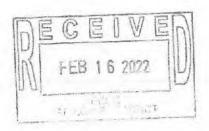
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allowing twice per week testing as an accommodation.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other employees and now religious exemptions for the certified teachers and employees, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district initially refused to grant my religious exemption request and left me unemployed for over three months which included the Thanksgiving and Christmas holidays. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missou Commission on Human Rights. I will advise the agencies if I change m	y				
address or telephone number and I will cooperate fully with them in th processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.				
I declare under penalty of perjury that the foregoing is true and correct.  * Multiple* Upline $\frac{2}{8}/22$	x Michael Selline Signature of Complainant				
	UN KASPER Sworm to be ore me this date (Day, month and Year)				
St. Commi	te of Missouri Charles County ssion # 15386761 John Fyriag 09 30 2022				

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 17 of 119 PageID



### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

STATIONS DISTRICT

	Enter Charge Number
	FEPA
1	EEOC 560-2022-00891

Missouri Commission on		-	
lame (Indicate Mr., Ms., or Mrs.) /Is. Wanda Brandon	Date of Birth	Home I	elephone No. (Include Area Code)
Street Address City, St.	ate and Zip Code		County
Named below is the Employer, Labor Organization, State or Local Government Agency who discrim			
lame Saint Louis Public School District	No. of Employees/Memb		phone No. (Include Area Code) -231-3720
treet Address 01 N. 11th Street	City, State and Zip Code Saint Louis, MO 6310		
lame loard of Education of the City of St. Louis	No. of Employees/Memb 500+		phone No. (Include Area Code) -231-3720
treet Address 01 N. 11th Street	City, State and Zip Code Saint Louis, MO 6310		
ause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other (Spe	cify)		Date Discrimination took Place (Month, Day, Year) August 2020121-Present Continuing Action
reginning on October 19, 2021 and. My worker's compensation attiveek paid leave after my surgery and then would be allowed to worthe district suspended me with pay on or about October 14, 2021, solaced me on unpaid leave on or about October 18, 2021. St. Louis Public Schools terminated me on October 26, 2021 for allother districts in the State of Missouri have implemented procedure continue teaching such as frequent COVID testing. This indicates to continue to teach, however the district has refused to entertain such interactive dialogue with me and other people who have requested employees of the district who have requested exemptions and none accommodating teachers and employees by allowing frequent testing.	rk from home during my allegedly because I did regedly violating board press where teachers without that there are accommodations. The religious exemptions. It is of us have been approving rather than terminating	recovery. not receive plicy. ut COVID dations the district he have spo ved for ar- ng them w	e the COVID vaccine. They  -19 vaccinations are able to at are available to allow me to as refused to engage in an oken with numerous other a exemption yould be reasonable and in the
est interests of all parties. The district has approved medical exer- ecommodations available that would allow the teachers and emplo- earn, but the district has refused to grant any religious exemptions.	byees to teach and performance Upon reason and belie	rm their of f the distr	luties and for the students to ict did not actually review my
I want this charge filed with both the EEOC and the Missouri ommission on Human Rights. I will advise the agencies if I change my ddress or telephone number and I will cooperate fully with them in the			et State and Local Requirements)
ocessing of my charge in accordance with their procedures.	I swear or affirm that I have the best of my knowledge.		above charge and that it is true to on and belief.
Maurice Secretary of perjury that the foregoing is true and correct.	x Manda Signature of Complainar	Bu	arbon 1229 a
Charging Party (Signature) Date	Subseribed and sworn to t	pefore me	1229-20 this date (Day, month and Year)
IAN 18 RECWAN 18 2022 molly day	Molly Mar Notary Public State of St Louis My Gommission El Commission	ia Droege Notary Seal Missouri County opires 08/12/2	MCHR-27 (4-9)

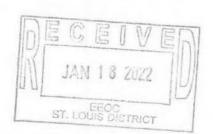
Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 18 of 119 PageID

request for religious exemption and issued blanket denials to all request in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue work-ing. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



Molly Marie Droege
Notery Public Notery Seal
State of Missoun
St Louis County
My Commission Expires 08/12/2024
Commission # 20430252

X	1	want	this	charge	filed	with	both	the	EEOC	and	the	Missouri
Com	mis	ssion	on H	uman R	ights.	I will	advis	e th	e agend	cies if	1 ch	nange my
addre	ess	or te	lepho	one num	ber a	and I	will c	oope	rate ful	y wit	h the	em in the
proce	255	ing of	my c	harge in	acco	ordani	ce with	h the	ir proce	dures	S.	

I declare under penalty of perjury that the foregoing is true and correct.

Wanta Browler 12-29 20

Charging Party (Signature)

Date

NOTARY – (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Complainant

Subscribed and sworn to before me this date (Day, month and Year)

ST. LOUIS DISTRICT

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#### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

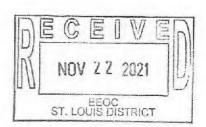
#### CHARGE OF DISCRIMINATION

Enter Charge Number	
FEPA	
EEOC 560-2022-00510	

	Missouri (	Commission on	<b>Human Rights</b>	and EE	oc
Name (Indicate Mr., Ms., or Ms. Naomi Davis	Mrs.)		Date of Birth	Hor	me Telephone No. (Include Area Code)
Street Address		City, Si	ate and Zip Code		County
Named below is the State or Local	e Employer, Labo Government Ager	or Organization, ncy who discrin	Employment A	gency, me (if n	Apprenticeship, Committee,
Name Saint Louis Public School			No. of Employees/M 500+	embers	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 6		
Name Board of Education of the City of St. Louis			No. of Employees/M 500+		Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street			City, State and Zip 0 Saint Louis, MO 6		
Cause of Discrimination ba Race National Origin Disability	sed on (Check appropriate Color Religion Retaliation	Sex Age Other (Spe			Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
continue teaching such a continue to teach, howe interactive dialog with memployees of the district Accommodating teacher all parties.  The Superintendent of Signature 19, 2021 in which he included in the continuation of the district and board has to possible accommodations seeking an exemple district and board hand of retaliating against members.	as frequent COVID test ver the district has refuse and other people what who have requested ers by allowing frequent schools for the district, licated that the district ployment with the St. Leave discriminated again dations of my beliefs the other persons who complaint and other employees filed with both the EEC of the refuse of the persons who complaints and other employees.	ting. This indicates used to entertain such that the exemptions and non-testing rather than the testing rather than the testing rather than the testing rather than the testing rather than the because of the the board meeting is the testing rather than the board meeting is the testing rather than the testing rather th	that there are accome haccommodations. Iligious exemptions. Iligious exemptions. Iligious exemptions en of us have been apperminating them would me a "Statement of without pay and that my religious beliefs into continue working. In opposition to the discrimination. The districtions beliefs resulting the accommodation of the districtions beliefs resulting the accommodation of the districtions beliefs resulting the accommodation of the accommodatio	modation The district I have specific proved for the rear for the cluding rear they have strict and the control of the control	ovID-19 vaccinations are able to as that are available to allow me to ict has refused to engage in an boked with numerous other or an exemption.  sonable and in the best interests of and Notice of Hearing" on October recommending to the board that I be afusing to engage in interactive dialove also retaliated against me for my boards' discriminatory policies. The best because of their religious beliefs and have knowingly and intentionally disparate treatment and disparate treatment and disparate.
address or telephone num processing of my charge in I declare under penalty of p	accordance with their pro	ocedures.	I swear or affirm that I the best of my knowle		d the above charge and that it is true to matign and belief.
X ALCHANGE Charging Party (Signature	las	11/16/21	X / Ooms	sinant 1	16-2021
		Note		to before	me this date (Day, month and Year)
NOV 2		El Cor	State of Missouri St. Charles County nmission # 153867 mission Expires 09-	61 30-2023	MCHR-27 (4-99)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 20 of 119 PageID

impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my			
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
I declare under penalty of perjury that the foregoing is true and correct.  X	x Toyons Signature of Complainant		
	Subscribed and sworn to perfore me this date (Day, month and Year)		
242	State of Missouri St. Charles County Commission # 15386761 My Commission Expires 09-30-2023		
ZOF L MORE	NAME OF THE PARTY		

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22

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## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

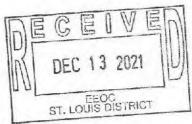
Enter Charge Number	
FEPA	
☐ FEPA  ■ EEOC 540-2022 0	0738

lame (Indicate Mr., Ms., or		nmission on i	luman Rights a	nd EE	UC		
Ms. Maisha Ellison	Mrs.)		Date of Birth	Но	me Telephone No. (Include Area Code)		
Street Address City, Si			te and Zip Code		County		
					Apprenticeship, Committe nore than one list below).		
Name Saint Louis Public Schoo	District		No. of Employees/Me 500+	embers	Telephone No. (Include Area Code) 314-231-3720		
Street Address 301 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 63				
Name Board of Education of the	City of St. Louis		No. of Employees/Me 500+		Telephone No. (Include Area Code) 314-231-3720		
Street Address 801 N. 11th Street			City, State and Zip C Saint Louis, MO 63				
Cause of Discrimination bas Race National Origin	ed on (Check appropriate bo Color Religion	x(es)) Sex Age			Date Discrimination took Place (Month, Day, Year) August 2020121-Present		
Disability	Retaliation	Other (Spec	sifu)		Continuing Action		
continue teaching such a	e of Missouri have implem s frequent COVID testing.	nented procedures . This indicates the	where teachers wit nat there are accomm	hout CO	The request for an exemption was VID-19 vaccinations are able to s that are available to allow me to ict has refused to engage in an		
Other districts in the State continue teaching such a continue to teach, however teractive dialogue with a commodating teachers all parties. The district hat would allow the teach reason and belief the distriction of our constitution of our constitution of our constitution, 20, 2021 in which he indiction and board has to possible accommodactions seeking an exemplation of seeking an exemplation of seeking an exemplation.	e of Missouri have implement frequent COVID testing, or the district has refused me and other people who who have requested exercised as approved medical exercited did not actually review and and statutory rights, chools for the district, Kelvicated that the district was loyment with the St. Louis we discriminated against relations of my beliefs that uption.	nented procedures. This indicates the to entertain such have requested reptions and none ting rather than temptions for other temptions for other to learn, but it was request for revin Adams, issued a suspending me was Public Schools, me because of my would allow me to	s where teachers with the there are accommodations. The eligious exemptions of us have been approximating them would eachers which indicate district has refused eligious exemption at the a "Statement of without pay and that or religious beliefs indicatinue working."	hout CO nodation The distr I have proved for d be rea ates that ed to gra nd issue Charge he was r luding re They hav	VID-19 vaccinations are able to is that are available to allow me to ict has refused to engage in an spoken with numerous other		

ST. LOUIS DISTRICT

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 22 of 119 PageID

and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY - (When necessary to meet State and Local Requirements)
ddress or telephone number and I will cooperate fully with them in the rocessing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
declare under penalty of perjury that the foregoing is true and correct.	× Maisha Cllison
Charging Party (Signature)  Date Nota	KEVIN KASPER 12/6/Z/ Subscriber and sworm to before the this date (Day, month and Year)
Соп	it. Charles County mission # 15386761 mission Fypires 09-30-2023 MCHR-27-

Case: 4:22-cv-00635-SRC

ST. LOUIS DISTRICT

Doc. #: 17-11

Filed: 09/08/22

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#: 442



# MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

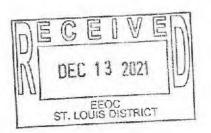
### CHARGE OF DISCRIMINATION

Ent	er Charge Number
	FEPA
X	er Charge Number FEPA EEOC <i>560-2022-00731</i> -

Name (Indicate Mr., Ms., o Ms. Hollis Flannery	or Mare \		n on Human Rights a		ome Telephone No. (Include Area Code)
	it wis.)		Date of Birth	1.40	ume relephone No. (mclude Area Code)
Street Address		C	City, State and Zip Code		County
					Apprenticeship, Committee more than one list below).
Name Saint Louis Public Scho	ool District		No. of Employees/M 500+	2012.00	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 6	3101	
Name Board of Education of t	he City of St. Louis		No. of Employees/M 500+	lembers	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street			City, State and Zip C Saint Louis, MO 6		
DESCRIPTION CONTROL	ased on (Check appropriat Color Religion Retaliation	Sex Age	r (Specify)		Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action
continue to teach, howe	as frequent COVID tes ever the district has refu	ting. This indicused to entertain	cates that there are accom in such accommodations.	modation The dist	OVID-19 vaccinations are able to ns that are available to allow me to trict has refused to engage in an spoked with numerous other
continue to teach, howe interactive dialog with nemployees of the district Accommodating teacher all parties. The district that would allow the teareason and belief the diviolation of our constituthe Superintendent of 20, 2021 in which he in discharged from my enter the district and board if as to possible accommand actions seeking an exemple.	as frequent COVID test aver the district has refunded and other people what who have requested as approved medical acher to teach and the sistrict did not actually retional and statutory right schools for the district dicated that the district apployment with the St. Leave discriminated agains odations of my beliefs to motion.	ting. This indicated to entertain on have request exemptions and testing rather texting rather texting rather to lear eview my requests.  Kelvin Adams, was suspendir outs Public Sonst me because hat would allowern and practical errors.	cates that there are accomin such accommodations. ted religious exemptions. It do not not not not not not the teachers which indicates the religious exemption in the teachers which indicates the religious exemption is the not	modation The dist I have soproved all be recated to grand issued to grand issu	ns that are available to allow me to trict has refused to engage in an spoked with numerous other
continue to teach, howe interactive dialog with nemployees of the district Accommodating teacher all parties. The district that would allow the teareason and belief the diviolation of our constituthe Superintendent of 20, 2021 in which he in discharged from my em The district and board if as to possible accommactions seeking an exemple district and board if it want this charge Commission on Human Faddress or telephone nur	as frequent COVID test as requent the district has refunded and other people what who have requested as approved medical acher to teach and the sistrict did not actually retional and statutory right schools for the district dicated that the district approved medicated that the district approved that the structure of the structu	ting. This indicated to entertain on have request exemptions and testing rather testing rather testing rather testing rather to learn to learn testing rather to learn testing rather test	cates that there are accomin such accommodations. Ited religious exemptions. Ited religious exemptions. Ited religious exemptions. Ited religious exemptions other teachers which indicate, but the district has refuses for religious exemptions. It is sued me a "Statement of the other teachers which has refused me a "Statement of the other without pay and that the other religious beliefs in the other religious beliefs in the other religious working.  BY TARY - (When responsible to the other religious beliefs in the other rel	modatio The dist I have soproved ald be recates that sed to grand issued of Charge the was cluding they have employed cessary	ns that are available to allow me to that has refused to engage in an spoked with numerous other for an exemption. asonable and in the best interests of at there are accommodations available and any religious exemptions. Upon led blanket denials to all request in less and Notice of Hearing" on Octobe recommending to the board that I be refusing to engage in interactive dials are also retaliated against me for my less because of their religious beliefs to meet State and Local Requirements) and the above charge and that it is true to

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 24 of 119 PageID

and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY (When necessary to meet State and Local Requirements)				
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.				
A Holles Flynnes Williams Sound Correct.  X Holles Flynnes Williams Sound Correct.  Charging Party (Signature)  Date	Super ped and text any long the related (pay, more) and Year)				
2.4	State of Missouri St. Charles County				

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 25 of 119 PageID

#: 444



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charge Number	
FEPA _	1
Enter Charge Number FEPA EEOC 560-2022-0159	4

Missouri Commis	ssion on h	luman Rights	and EE	OC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Sharon Hardnett		Date of Birth	H	ome Tele	ephone No. (Include Area Code)
Street Address	City, Sta	te and Zip Code			County
Named below is the Employer, Labor Orga State or Local Government Agency wh					
Name Saint Louis Public School District		No. of Employees/i 500+	-	Teleph	one No. (Include Area Gode) 31-3720
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Saint Louis, MO			
Name Board of Education of the City of St. Louis		No. of Employees/l 500+	Vlembers		one No. (Include Area Code) 31-3720
Street Address BO1 N. 11th Street		City, State and Zip Saint Louis, MO	Code 63101		
Cause of Discrimination based on (Check appropriate box(es))  Race Color National Origin Religion	Sex Age Other (Spec				Date Discrimination took Place (Month. Day, Year)  August 2020121-Present  Continuing Action
continue teaching such as frequent COVID testing. This continue to teach, however the district has refused to er interactive dialogue with me and other people who have employees of the district who have requested exemption Accommodating teachers by allowing frequent testing reall parties. The district has approved medical exemption that would allow the teacher to teach and the students to reason and belief, the district did not actually review my violation of our constitutional and statutory rights.  The district administration harassed its employees, including the district suspended me on October 15, 2021, because	ntertain such e requested none ather than ter ons for other to to learn, but to r request for r uding myself,	accommodations. eligious exemption of us have been a minating them wo eachers which indi he district has refu eligious exemption to get the vaccine	The dist	rict has e spoke for an e asonabl at there ant any ued blar ade me	refused to engage in an en with numerous other xemption. The early interests of are accommodations available religious exemptions. Upon the denials to all request in extremely distraught and 2022
I want this charge filed with both the EEOC and the Commission on Human Rights. I will advise the agencies if I address or telephone number and I will cooperate fully with processing of my charge in accordance with their procedures.	he Missouri change my them in the	NOTARY – (Whan n	ecessary (	o meet s	State and Local Requirements)  The Common State of the Common Stat
Charging Party (Signature) KEVI Notary Put	IN KASPERI-		lajviant (		が /2 こ date (Day; month and Year) MCHR-27 (4-99)

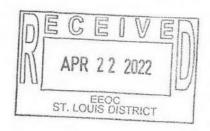
Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 26 of 119 PageID

me without pay on October 16, 2021. They scheduled a meeting with me on October 26, 2021. I spoke with Kar-la Dozier on October 26, 2021, and she indicated the district would still not grant my religious exemption request. I knew that they would seek my termination. I resigned my termination on October 26, 2021, because of the con-tinued harassment, hostile working environment and knowledge that they would terminate me if I did not resign.

The district changed its mind on January 24, 2022 and decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about

their discriminatory poli-cies and practices.



I want this charge filed with both Commission on Human Rights. I will advis	e the agencies if I change my	NOTARY – (When necessary to meet State and Local Requirements)	
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
A Charging Party (Signature)	6 4/21/22	Signature of Complainant  V/21/22  Substitute of Sad Sworn to before me this date (Day, month and Year)	
	State o St. Char Commission	t Missouri ries County on # 15386761 Expires 09-30-2023 MCHR-27-2	

Filed: 09/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

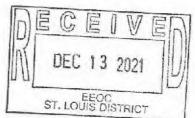
### **CHARGE OF DISCRIMINATION**

Enter Charge Number	
FEPA	
Enter Charge Number  FEPA  EEOC 560 - 2022 - 6	20741

Missouri Commission Name (Indicate Mr., Ms., or Mrs.)	Date of Birth		elephone No. (Include Area Code)
Ms. Kimberly Holman-Rome	Date of Birth	nome I	elephone No. (Include Area Code)
Street Address C	ity, State and Zip Code		County
Named below is the Employer, Labor Organizat State or Local Government Agency who dis			
Name Saint Louis Public School District	No. of Employees/Mer 500+		phone No. (Include Area Code) 231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Co Saint Louis, MO 63		
Name Board of Education of the City of St. Louis	No. of Employees/Mer 500+		ohone No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street	City, State and Zip Co Saint Louis, MO 63		
Cause of Discrimination based on (Check appropriate box(es))  Race  Color  Sex  National Origin  Religion  Other  The Particulars Are (If additional space is needed, attach extra sheet(I) began working for the Board of Education of the City of St. Lilleft for the 2009-10 school year and returned for the 2010-11 On August 24, 2021 the Board of Education adopted a policy requirement conflicts with my sincerely held religious beliefs.	ouis & Saint Louis Public So school year. I have been a	at Woodward	d Elementary since 2011.
Other districts in the State of Missouri have implemented proc continue teaching such as frequent COVID testing. This indic continue to teach, however the district has refused to entertain interactive dialogue with me and other people who have reque employees of the district who have requested exemptions and Accommodating teachers and employees by allowing frequent best interests of all parties. The district has approved medical accommodations available that would allow the teacher to tea religious exemptions. Upon reason and belief the district did reliance to all request in violation of our constitutional at The district suspended me with pay on October 15, 2021 and Schools terminated me on October 26, 2021.  The district and board have discriminated against me because dialogue as to possible accommodations of my beliefs that we for my actions seeking an exemption.  The district and board have engaged in a pattern and practice and of retaliating against persons who complain about such discriminated against such district and board have engaged in a pattern and practice and of retaliating against persons who complain about such discriminated against persons who co	ates that there are accommon such accommodations. The sted religious exemptions. It none of us have been apply the testing rather than terminal exemptions for other teach chand the students to learn not actually review my request and statutory rights. Suspended me without pay the of my religious beliefs included allow me to continue we of discriminating against en	odations that he district had I have spot roved for an atting them where which ir n, but the distest for religion October auding refusir orking. They apployees be	at are available to allow me to as refused to engage in an ken with numerous other exemption.  Tould be reasonable and in the adicates that there are strict has refused to grant any ous exemption and issued  16, 2021. St. Louis Public and to engage in interactive y have also retaliated against measure and the strict has refused to grant any ous exemption and issued
I want this charge filed with both the EEOC and the Miss Commission on Human Rights. I will advise the agencies if I change address or telephone number and I will cooperate fully with them in processing of my charge in accordance with their procedures.	NOTARY - (When nece	essary to mee	t State and Local Requirements) above charge and that it is true to
Notary Publ	Signature of Complain KASPER ic, No Subscribed and sworn t	7/1/	Holmon Ranc 12-6-21 his date (Day, month and Year)
DEC 13 2021 St. Char Commission	f Missouri des County on # 15386761 Expires 09-30-2023	10/2	MCHR-27 (4-99)

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discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.



		J
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		
		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the fore	going is true and correct.  - Dance 12/4/2/	x Kimberl a. Holmon Rono Signature of Compleinant
Charging Party (Signature)	KEVM RAS Notary Public, N	DESCRIPTION OF THE PROPERTY OF
	State of Mis St. Charles C Commission # 1 My Commission Expl	County 15386761 MCHR-27-2 A

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 29 of 119 PageID

MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

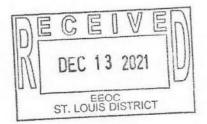
### CHARGE OF DISCRIMINATION

Enter	Charge Number
	FEPA
$\boxtimes$	EEOC560-2021-02642

	Missouri	Commi	ission on	Human Rights	and EE	EOC	
Name (Indicate Mr., Ms., or Ms. Wendy Huddleston	Mrs.)			Date of Birth	He	ome Telephone No.	(Include Area Code)
Street Address			City, Sta	ate and Zip Code		County	
Named below is the State or Local G							
Name Saint Louis Public School	E. 1			No. of Employees/I 500+	-		clude Area Code)
Street Address 801 N. 11 <sup>th</sup> Street				City, State and Zip Saint Louis, MO			
Name Board of Education of the	City of St. Louis			No. of Employees/I 500+	Members	Telephone No. (In 314-231-3720	clude Area Code)
Street Address 801 N. 11th Street				City, State and Zip Saint Louis, MO			
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Date Discrimination based on (Check appropriate box(es))  August 20201			nination took Place v, Year) 20121-Present uing Action				
Commission on Human Rig address or telephone numb	at the district has reficial to the district has reficial to the district has reficial to the district has refice and other people who have requested to the end other people who have requested to the end other people who have requested to the end other employed and other employed is the end other employed is the end of a class of singular to the end of a class of singular to the end of the end	as denied used all restricted the requipmenter string. The fused to each of have represented the requipment of the requipment of the requipment of the requipment of the requirement of	by the district equests for religion to provide an uest for religion procedure is indicates to the terms and none oractice of discriming and other and other and other and other and the Missouri I change my them in the	eligious exemption. In outline of how the ious exemptions are swhere teachers what there are according accommodations. It is of us have been a scriminating against ination. The district persons seeking restary damages, starts comprising of persons for the board's	The district end whether without Commodation. The district employed the employed th	strict has not given evaluated religious er there was a revi OVID-19 vaccinations that are available trict has refused to spoken with numer for an exemption. Less because of the ard have knowing in disparate treatment exemptions and for amages, and punit in religious beliefs ct's policies which ch interfere with support that the state and the state a	n reasons for the exemption ew process. ons are able to be to allow me to be engage in an rous other eir religious beliefs ly and intentionally ent and disparate complaining about the damages on which are infringed interfere with our uch beliefs, who the call requirements)
I declare under penalty of po	erjury that the foregoing	is true and	d correct.	X Signature of Comp  ASPER Slubscriped and swo	ledge, ir to	ST. LOUIS DI	STRICT
	142	Co	State of N St. Charle ommission	Missouri	A	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	MCHR-27 (4-99

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district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



MCHR-27-2 AI

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY – (When necessary to meet State and Local Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct.  x Lesses flux CC2 - 11/2/21	XU20/H20 QCorto, Signature of Somplainant
Charging Party (Signature) Date	Substituted and select me this date (Day, month and Year)
242	State of Missouri St. Charles County Commission # 15386761 My Commission Expires 09-30-2023 MCHR-27-2

Case: 4:22-cv-00635-SRC

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
$\boxtimes$	EEOC 560-2022-0092	3

	i Commission on			
Name (Indicate Mr., Ms., or Mrs.) Mr. Precious Mabry		Date of Birth	Но	me Telephone No. (Include Area Code)
Street Address	City, St	ate and Zip Code		County
Named below is the Employer, La State or Local Government Ag				
Name Saint Louis Public School District		No. of Employees/N 500+	lembers	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip C Saint Louis, MO 6		
Name Board of Education of the City of St. Louis		No. of Employees/N 500+		Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street		City, State and Zip C Saint Louis, MO 6		
Cause of Discrimination based on (Check appropriate Race Color Religion Disability Retaliation	riate box(es)) Sex Age Other (Spe	cify)	× : 860	Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action
requirement conflicts with my sincerely held I applied for a religious exemption including a denied by the district.  The district suspended me with pay on or ab placed me on unpaid leave on or about Octo St. Louis Public Schools terminated me on Other districts in the State of Missouri have i continue teaching such as frequent COVID to continue to teach, however the district has reinteractive dialogue with me and other people employees of the district who have requested.	out October 14, 2021, aber 18, 2021. October 26, 2021 for allamplemented procedure esting. This indicates the fused to entertain such e who have requested	allegedly because I of the second segments where teachers where the accomplishments accommodations. The second sec	did not re rd policy. ithout CO modation The distr s. I have	Ceive the COVID vaccine. They  OVID-19 vaccinations are able to as that are available to allow me to ict has refused to engage in an appoken with numerous other
The certified teachers were given statement employees such as myself were terminated.  I have learned that the district reversed its possible.				
2022. The district has agreed to grant the ce				
I want this charge filed with both the E Commission on Human Rights. I will advise the address or telephone number and I will cooperate processing of my charge in accordance with their	agencies if I change my te fully with them in the	I swear or affirm that I	have read	meet State and Local Requirements)  the above charge and that it is true to
x Hold (Signature)	12. CENTER KEVIN KASPER	X Signature of Comple	ainant	1/20/22
ST (DEFOC	Notery Public, Notal State of Missou St. Charles Coun Commission # 1538 Commission Expires (	ri ty 6761	to before	me this date (Day, month and Year)  MCHR-27 (4-99)

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#: 4

the accommodation is available without undue cost to the district.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other em-ployees and now religious exemptions for the certified teachers, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district has refused to grant my religious exemption request. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue work-ing. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY – (When necessary to meet State and Local Requirements)
		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, infogration and belief.
I declare under penalty of perjuny that the	foregoing is true and correct.	x Signature of Complainant 1/20/22
Charging Party (Signature)	Notary Public	SPER
	State of N St. Charles Commission My Commission Ex	Alissouri s County # 15386761 MCHR-27.

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22

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## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

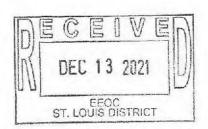
### CHARGE OF DISCRIMINATION

Ente	r Charge Number
	FEPA
$\boxtimes$	EEOC 560-2022-00739

Missouri Commiss	sion on Human Rights and	EEOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Diane Mathieson	Date of Birth	Home Telephone No. (Include Area Code)
Street Address	City, State and Zip Code	County
Named below is the Employer, Labor Organi State or Local Government Agency who		
Name Saint Louis Public School District	No. of Employees/Memb 500+	pers Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 6310	
Name Board of Education of the City of St. Louis	No. of Employees/Memb 500+	pers Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 6310	
National Origin Religion A	ex ge Other (Specify)	Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
requirement conflicts with my sincerely held religious belief applied for a religious exemption including supplying a widenied by the district.  Other districts in the State of Missouri have implemented continue teaching such as frequent COVID testing. This is continue to teach, however the district has refused to enterinteractive dialog with me and other people who have requested exemptions. Accommodating teachers by allowing frequent testing ratically parties.  The Superintendent of Schools for the district, Kelvin Ada November 2, 2021 in which he indicated that the district withat I be discharged from my employment with the St. Lot The district and board have discriminated against me bed as to possible accommodations of my beliefs that would a actions seeking an exemption.  The district and board have engaged in a pattern and pra and of retaliating against persons who complain about su discriminated against me, and other employees because impact. The Board and District has retaliated against me.  I want this charge filed with both the EEOC and the Commission on Human Rights. I will advise the agencies if I dadress or telephone number and I will cooperate fully with the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and of the commission of the processing of my charge in accordance with their procedures.	procedures where teachers without indicates that there are accommoderations. The grand none of us have been appropriate than terminating them would be assumed that the are accommoderations. The sand none of us have been appropriate than terminating them would be assumed that terminating them would be assumed to a "Statement of Clavas suspending me without pay and uis Public Schools. The same of my religious beliefs included allow me to continue working. The action of our religious beliefs resulting in the and other persons seeking religions. Missouri hange my term in the action of companies where the best of my knowledge to a pate of Companies.  Notary – (When necessary to accompanies) and the best of my knowledge to accompanies. The best of my knowledge to accompanies and the best of my knowledge to accompanies.	ut COVID-19 vaccinations are able to dations that are available to allow me to district has refused to engage in an ave spoked with numerous other ved for an exemption. The reasonable and in the best interests of marges and Notice of Hearing" on and that he was recommending to the board ling refusing to engage in interactive dialog by have also retaliated against me for my boloyees because of their religious beliefs diboard have knowingly and intentionally both disparate treatment and disparate has exemptions and for complaining about sary to meet State and Local Requirements).  We read the above charge and that it is true to information and belief.

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their discriminatory policies and practices.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY - (When necessary to meet State and Local Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
x Machine (Signature)  I declare under penalty of perjury that the foregoing is true and correct.	Signature of Complainant  KEVIN KASPER  Subagribed and sworn o before the this parte (Day mointh and Year)
24	St. Charles County Commission # 15386761 My Commission Expires 09-30-2023 MCHR 27-2 A

Case: 4:22-cv-00635-SRC Doc. #: 17-11

ST. LOUIS DISTRICT

Filed: 09/08/22

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## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### **CHARGE OF DISCRIMINATION**

Enter Charge Number	
FEPA	
X EEOC 560-2022-00740	>

Missouri Commission on Human Rights and EEOC					
Name (Indicate Mr., Ms., or Mrs.) Ms. Tomka Slaughter		Date of Birth	Hon	ne Telephone No. (Include Area Code)	
Street Address	City, Sta	te and Zip Code		County	
<u> </u>					
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).					
Name Saint Louis Public School District		No. of Employees/Members Telephone No. (Include Area Code) 314-231-3720			
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Code Saint Louis, MO 63101			
Name Board of Education of the City of St. Louis		No. of Employees/M 500+	of Employees/Members Telephone No. (Include Area Code) 0+ 314-231-3720		
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101				
Cause of Discrimination based on (Check appropriate box)	Date Discrimination took Place (Month, Day, Year)				
National Origin Religion	Age	Sex Age		August 2020121-Present	
Disability Retaliation  The Particulars Are (If additional space is needed, attach e	Other (Spec	cify)		Continuing Action	
requirement conflicts with my sincerely held religious I applied for a religious exemption including supplying denied by the district.  Other districts in the State of Missouri have implement continue teaching such as frequent COVID testing. Continue to teach, however the district has refused to interactive dialogue with me and other people who have requested exemployees of the district who have requested exemployees interests of all parties. The district has approve accommodations available that would allow the teach learn, but the district has refused to grant any religion request for religious exemption and issued blanket of the district suspended me with pay on October 13, 27. The district and board have discriminated against medialogue as to possible accommodations of my belief for my actions seeking an exemption.  The district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged in a pattern and and of retaliating against persons who complain about the district and board have engaged i	and a written state ented procedure: This indicates the original entertain such a verequested reptions and none agreement testined medical exemptions. It is a second to the exemptions. It is a second to the exemptions. It is a second to the exemptions of the exemptions of the exemptions. It is a second to the exemptions of the exemption of	s where teachers win at there are accommodations. The religious exemptions of us have been apply at their than terminations for other emply ees to teach and pupon reason and buest in violation of o Public Schools terminations beliefs incomme to continue worminating against the recommodations are recommediated.	thout CO\ modations The district The distric	VID-19 vaccinations are able to a that are available to allow me to ct has refused to engage in an spoken with numerous other or an exemption.  In would be reasonable and in the chich indicates that there are eit duties and for the students to district did not actually review my utional and statutory rights.  If on October 16, 2021.  If using to engage in interactive They have also retaliated against me as because of their religious beliefs	
I want this charge filed with both the EEOC an Commission on Human Rights. I will advise the agencies address or telephone number and I will cooperate fully w processing of my charge in accordance with their procedur. I declare under penalty of perjury that the foregoing is true					
DEC 13 2021 142 M	Notary Publ State o St. Char Commission	Substitution of the substi		me this date (Day, month and Year)  MCHR-27 (4-99) A	

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discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	r i			
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.				
I declare under penalty of perjury that the foregoing is true and correct.  X JUWIN 12/9/21 Charging Party (Signature) Date	Signature of Complainant  Subscribed and Safeting Beneral Assatis See (Day, manth and Year)			
2.f2	State of Missouri St. Charles County Commission # 15386761 My Commission Expires 09-30-2023			

MCHR-27-2 Al

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

	- Characteristics
	r Charge Number
	FEPA
X	EEOC 560-2022-00178

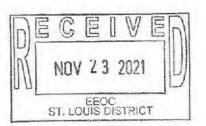
Variation (CC)

	Missouri Com	mission on	Human Rights a	nd EE	OC	
Name (Indicate Mr., Ms., or I Ms. Shenicquel "Nikki" Sp			Date of Birth	Hor	me Teleph	none No. (Include Area Code)
Street Address City, Sta			ate and Zip Code			County
	Employer, Labor Or Sovernment Agency					nticeship, Committee, aan one list below).
Name Saint Louis Public School	District		No. of Employees/Mo 500+		Telephon 314-231	e No. (Include Area Code) -3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 63			
Name Board of Education of the	City of St. Louis		No. of Employees/Me 500+		Telephon 314-231	e No. (Include Area Code) -3720
Street Address 801 N. 11th Street			City. State and Zip C Saint Louis, MO 63			
Cause of Discrimination base Race National Origin Disability	Color Religion Retaliation	(es)) Sex Age Other (Spe			(M	te Discrimination took Place onth. Day. Year) igust 2021-Present Continuing Action
denied by the district. Other districts in the State continue teaching such as continue to teach, however interactive dialog with me employees of the district Accommodating teachers all parties. The Superintendent of Sc 20, 2021 in which he indice discharged from my employees to possible accommodations seeking an exemptate district and board has and of retaliating against.	e of Missouri have implement of frequent COVID testing. The district has refused to and other people who have who have requested exemply allowing frequent testing the district was solved that the district was solved that the district was solved in an action of my beliefs that we be engaged in a pattern and persons who complain about the district was solved in an action of my beliefs that we be engaged in a pattern and persons who complain about the district was solved in a pattern and persons who complain about the district was solved in a pattern and persons who complain about the district was solved in a pattern and persons who complain about the district was solved in a pattern and persons who complain about the district was solved in th	ented procedure. This indicates to entertain such the requested respitions and noneing rather than ten adams, issue suspending me Public Schools, the because of mould allow me to coard meeting in a practice of disput such discriminate the Missouri	es where teachers with that there are accommodations. It is is accommodations. It is accommodations are of us have been appearminating them would me a "Statement of without pay and that by religious beliefs incommodation to the dissoriminating against elination. The district	thout CO modation The distri- I have sp proved for dibe reas Charges he was re- cluding re- They have strict and employee and boa	VID-19 version that are cooked with the cooked with the cooked with the cooked with the cooked and No recommendation to the cooked with the cooked and the cooked with the cooked and the	vaccinations are able to e available to allow me to efused to engage in an th numerous other emption. and in the best interests of tice of Hearing" on October ending to the board that I be o engage in interactive dialog etaliated against me for my
address or telephone numb processing of my charge in a	nts. I will advise the agencies er and I will cooperate fully viccordance with their procedur rjury that the foregoing is true  NOV Z 3 2021  EEOC ST. LOUIS DISTRICT	with them in the res.	X Signature of Compla	VIN KAS	PER 10	Att (Day, month and Year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 38 of 119 PageID

discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



My Commission Expires 09-30-2023

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY - (When necessary to meet State and Local Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of pay knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct  X  Charleing Party (Signature)  (Date	X Signature of Corposition of the Subscribed and several programme sale (Day, munth and Year)
2 d 2	State of Missouri St. Charles County Commission # 15386761 MCHR-27-2 Al

Filed: 09/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### **CHARGE OF DISCRIMINATION**

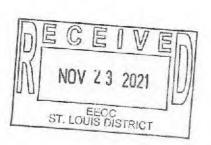
Enter Charge Number	
FEPA	
EEOC 560-2022-00511	

	on on Human Rights		V v v v v v v v v v v v v v v v v v v v
Name (Indicate Mr., Ms., or Mrs.) Ms. Danielle Watson	Date of Birth	Home Te	elephone No. (Include Area Code)
Street Address	City, State and Zip Code		County
Named below is the Employer, Labor Organiz State or Local Government Agency who d			
Name Saint Louis Public School District	No. of Employees/N 500+		phone No. (Include Area Code) 231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip ( Saint Louis, MO 6		
Name Board of Education of the City of St. Louis	No. of Employees/M 500+		phone No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street	City, State and Zip C Saint Louis, MO 6		
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age			Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action
requests, what their criteria was, who reviewed the request Other districts in the State of Missouri have implemented precontinue teaching such as frequent COVID testing. This incontinue to teach, however the district has refused to entert interactive dialog with me and other people who have requested employees of the district who have requested exemptions at The Superintendent of Schools for the district, Kelvin Adam 18, 2021 in which he indicated that the district was suspend discharged from my employment with the St. Louis Public St. The district and board have discriminated against me because to possible accommodations of my beliefs that would alk actions seeking an exemption and complaining about the district and board have engaged in a pattern and practicated of retaliating against persons who complain about such discriminated against me, and other employees because of	dicates that there are accommodations. It is a commodation in such accommodations. It is a commodation in a	ithout COVID- modations that The district had I have spoked oproved for any of Charges and the was reconscluding refusing They have also story policies. employees be than and board had g in both disposi-	at are available to allow me to as refused to engage in an with numerous other exemption.  If Notice of Hearing" on October numending to the board that I be not engage in interactive dialogs or retaliated against me for my ecause of their religious beliefs are knowingly and intentionally
Commission on Human Rights. I will advise the agencies if I charaddress or telephone number and I will cooperate fully with then processing of my charge in accordance with their procedures.	nge my		above charge and that it is true to n and belief.
X Charging Party (Signature) C E V E NOV 2 3 2021	262 Signature of compo	n to before me	his date (Day, month and Year)  MCHR-27 (4-99)

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impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



	t I have read the above charge and that it is true to
I declare under penalty of perjury that the foregoing is true and correct.	
X   Charging Party (Signature)   Date   X   Signature of Config	KEVIN KASPER
	State of Missouri State of Missouri St. Charles County Commission # 15386761 ommission Expires 09-30-2023

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ECC (1971)				
CHARGE OF DISCRIMINATION This form is afficied by the Favery Act of 1976. See envioced Privacy Act Statement and other orientation before completing this ions	Gharge X	Presented To / FEPA E- 11/21- EEOC ) (E-21		7
Missouri Commission	On Human R			EEOC
State of total Age	ncy, if any	Harris Decision (final) Establish	Panel Date of	Ridir
Nane (indicate Mr., Ms., Mrs.) Mrs. Tammy O'Connor		Home Phone (Ind. Area)	Cone)	LAND
	and ZIP Code		County	
15-5 (4) - 707-551				
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Discriminated Against Me or Others: (If mere than two fish under PARTICULARS	o Committee, or Sta Thelow t	ite of Local Guvernment	Agency That   Believ	rg.
Namo	and a minimum and a second	No. Employees, Membris	Prone No Analudo A	Arma (Sante)
St. Louis Public Schools		15+	314.231.3720	3
5 1 1 2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	ry ZIP Code		a a grand also and a second	
801 N. 11th Street St. Lou	ils, MO 63101			
HAGE COLOR SEX X RELIGION  RETALIATION ASC DISABILITY OT  THE PARTICULARS ARE REadstraged paper is accorded, affore extra character):	NATIONAL ORIGI		DONTINUING ACTION	
information that had not been included already. I included religious belief. I quoted scripture, cathecism, and other a not want to be complicit in murder by taking a "vaccine" taking a "vaccine" to granted an appeal.	rticles that I d	id not need to sup	port my belief.	) did
I believe the Respondent failed to accommodate my COV Catholic.  1. I submitted my request with ample information to "there is not sufficient information for the District exemption." I was denied and not allowed an appe	show my sinc to grant your	erely held religiou	s bellef. I was t	old:
I believe I was placed on unpaid leave by the Respondent  1. The Respondent placed me on unpaid leave beginn	ning October1	8, 2021.		
As remedy, I desire an end to the discrimination and anythic	ng else the Co	mmission deems j	ust and proper.	
I want this charge filed with both the EEOC and the State or local Agency, it any. I will advise the agencies if I change my address or priore number and I will concern fully with them in the processing of my charge in accordance with their procedures.		nouvescay ha Sloke and Loc		,
declare under panelly of perjury that the above is true and correct.	I swear or affirm the best of my a SIGNATURE OF C	that I have road the abov toviledge, information and	d belief	
* 11/4/201 × 1/2 1/2 1/2 1/2		CIMPI MININI	NDV Joffers	is true to
Data Charging Party Signature	SUBSCIFICED ANd	)-SWORN TO BEFORE ME	15 m	is true in

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EEOC FORM 131-A (11/09)

U.S. Equal Employment Opportunity Commission

		PERSON FILING CHARGE
<del></del>	<del></del>	
		Tammy O'Connor
		THIS PERSON (check one or both)
		X Claims To Be Aggrieved
ST. LOUIS PUBI 801 N. 11th Stre		Is Filing on Behalf of Other(s)
Saint Louis, MO		EEOC CHARGE NO.
		28E-2022-00143
l <u>L</u>		FEPA CHARGE NO.
-		E-11/21-53427
NOTICE OF	CHARGE OF DISCRIMINATION IN JURISDICTION WHER (See the enclosed for additional information	
THIS IS NOTICE T	HAT A CHARGE OF EMPLOYMENT DISCRIMINATION UNDER	
X Title VII of the	ne Civil Rights Act (Title VII) The Equal Pay Act (EPA)	The Americans with Disabilities Act (ADA)
The Age Dis	Scrimination in Employment Act (ADEA)  The Genetic Infe	ermation Nondiscrimination Act (GINA)
HAS BEEN RECEI	VED BY	
The EEOC ar	nd sent for initial processing to	
		(FEP Agency)
X The Misso	uri Commission On Human Rights	and sent to EEOC for dual filing purposes.
	(FEP Agency)	<del></del>
charge, EEOC may	risdiction (upon expiration of any deferral requirement if this is a y suspend its investigation and await the issuance of the Agency' n weight by EEOC in making its own determination as to whether occurred.	s final findings and orders. These findings and
considered by EEC	encouraged to cooperate fully with the Agency. All facts and evidence when it reviews the Agency's final findings and orders. In man sity of an investigation by both the Agency and EEOC. This likely	y cases EEOC will take no further action, thereby
For such a request order. If the Agenc Regardless of whe	narge, you may request that EEOC review the final findings and of to be honored, you must notify EEOC in writing within 15 days of y terminates its proceedings without issuing a final finding and or ther the Agency or EEOC processes the charge, the Recordkeep enclosed information sheet apply.	your receipt of the Agency's final decision and der, you will be contacted further by EEOC.
For further corresp	ondence on this matter, please use the charge number(s) shown	above.
Enclosure(s): Cop	y of Charge	
CIRCUMSTANCES O	F ALLEGED DISCRIMINATION	
Race Color	Sex Religion National Origin Age Disability	Retaliation Genetic Information Other
See enclosed copy o	f charge of discrimination.	
	I	Lac
Date	Name / Title of Authorized Official	Signature
November 9, 2021	Lloyd J. Vasquez, Jr., District Director	

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Doc. #: 17-11

Filed: 09/08/22

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### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS.

#### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
X	EEOC	
	alane .	

M	issouri Commission or	Human Rights and E	EOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Jamell Wren		Date of Birth	lome Telephone No. (Include Area Code)
Street Address	City, S	State and Zip Code	County Saint Louis City
Named below is the Employ State or Local Government	er, Labor Organization ent Agency who discrir	, Employment Agency minated against me (if	, Apprenticeship, Committee, more than one list below).
Name Saint Louis Public School District		No. of Employees/Members 500+	The second secon
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Code Saint Louis, MO 63101	<u> </u>
Name Board of Education of the City of St.	Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101	014 201 0120
Cause of Discrimination based on (Chec Race Color National Origin Relig Disability Reta The Particulars Are (If additional space is	r Sex ion Age liation Other (Spi	ecify)	Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
I was informed in a staff meeting by religious exemptions. Ms. Akinola be Resources Officer that religious exerteceived the complaint but did not tal accommodations.  The district denied all requests for material and generally applicable.  I applied for a medical exemption what twice per week testing.  Other districts in the State of Missou	ely held religious beliefs. I ap diditional information for reconstitute Director of Transportation egan to harass me when I refumptions were not being approvise any further action. He did it did a section while grant discriminated against persons that was granted by the district in the time implemented procedurated to the EEOC and the Missourity is the agencies if I change my cooperate fully with them in the with their procedures.  The foregoing is true and correct.  KEVIN KASPE Notary Public, Nota State of Missourity Public Misso	plied for a religious exemption of sideration but it was also denoted and that the Superused to take the vaccine. I coved and that I was being hard not deny that the district was not deny that the district was sing the majority of requests fiseeking religious exemptions.  The accommodation soughes where the employees with the est that there are accommodated in NOTARY – (When necessary)  I swear or affirm that I have restricted in the street of Complainant in Superior of Compl	intendent was not approving any omplained to the Chief Human assed. He acknowledged that he not granting any religious or medical and disability exemptions. and its policies and actions were not not for both exemptions was the same—  actions that are available to allow me to to meet State and Local Requirements)
	St. Charles Cou Commission # 153 My Commission Expires	186761	MCHR-27 (4-99) AI

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continue to work in the district, however the district has refused to entertain such accommodations.

The district has refused to engage in an interactive dialogue with me and other people who have requested reli-gious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us were approved for an exemption.

The district suspended without pay and terminated the employees who's religious exemptions they denied if they did not receive a medical exemption. The certified teachers were given statement of charges and suspended without pay pending hearings to terminate them. Noncertified employees were terminated.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. I did not receive a religious exemption and had to complain to administration. They granted my religious exemption on January 28, 2022. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on January 24, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district approved medical exemptions for other employees and now religious exemptions for the certified teachers and employees, which indicates that there are accom-modations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district refused to grant my religious exemption request. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Mi Commission on Human Rights. I will advise the agencies if I change	e my
address or telephone number and I will cooperate fully with them processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
x Admiller Denalty of perjury that the foregoing is true and correct the f	x Jaul Wn Signature of Complainant 7-2 9-22
KEVIN	KASPESubscribed and sworn to before me this date (Day, month and Year)

State of Missouri

St. Charles County

Commission # 15386761 Commission Expires 09-30-2023 2 of 2

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Filed: 09/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Ente	er Charge	Number	
×	FEPA	560-2022-02258	
$\times$	EEOC		

Missouri Co	ommission on	Human Rights a	ind EEO	S
Name (Indicate Mr., Ms., or Mrs.) Mr. Virgil Williams		Date of Birth	Home	Telephone No. (Include Area Code)
Street Address	City, Sta	ate and Zip Code		County
Named below is the Employer, Labor State or Local Government Agend				
Name Saint Louis Public School District		No. of Employees/M 500+		elephone No. (Include Area Code) 14-231-3720
Street Address 801 N: 11th Street		City, State and Zip C Saint Louis, MO 6		
Name Board of Education of the City of St. Louis		No. of Employees/M 500+		elephone No. (Include Area Code) 14-231-3720
Street Address 801 N. 11th Street		City, State and Zip C Saint Louis, MO 6		
Cause of Discrimination based on (Check appropriate in Race Color Religion Disability Retailation	box(es)) Sex Age Other (Spe	cify)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
On August 24, 2021 the Board of Education adoler requirement conflicts with my sincerely held relig statement outlining my beliefs including a statem district did not grant any requests for religious ex.  The St. Louis Public Schools terminated me on Cother districts in the State of Missouri have implet to continue working, such as frequent COVID test continue to work in the district, however the district engage in an interactive dialogue with me and of other employees of the district who have request.  The certified teachers were given statement of cleans.	pious beliefs. I app nent from my Pasto temptions. The dist October 15, 2021 for emented procedure sting. This indicate ict has refused to e ther people who ha ted exemptions and	lied for a religious enter the request for a rict harassed me to a subject the employ as that there are according to the requested religion of the requested religions.	cemption in n exemption get the vaca board police es without mmodations us exemption proved for	cluding supplying a written in was denied by the district. The cination.  Y. COVID-19 vaccinations are able as that are available to allow me to the district has refused to ons. I have spoken with numerous an exemption.
employees such as myself were terminated.  Accommodating teachers and employees by allo best interests of all parties. The district approved certified teachers and employees, which indicate employees to teach and perform their duties and request and left me unemployed which included	owing frequent testi d medical exemptions that there are act of for the students to the Thanksgiving a	ng rather than termin ons for other employ commodations avail learn, but the distric and Christmas holida	nating them ses and no able that we trefused to ys. Upon r	would be reasonable and in the w religious exemptions for the ould allow the teachers and o grant my religious exemption
Commission on Human Rights. I will advise the agen address or telephone number and I will cooperate fur processing of my charge in accordance with their processing.	ncies if I change my	I swear or affirm that the best of my knowle		ne above charge and that it is true to ition and belief.
I declare under penalty of perjury that the foregoing is	7/1/22	Signature of Comple	ll's ainant	711/22
Charging Fund (Oighatore) AMANDA L. MILLER Notary Public - Notary Seal	Date	Subscribed and swort	to before m	ie this date (Day, month and Year)
St Charles County - State of Missouri Commission Number 13534807 My Commission Expires Oct 6, 2025				MCHR-27 (4-99)

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#: 465

actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated/reappointed on January 24, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation. I was rehired as a Special Education Instructor Care Aide on or about February 7, 2022.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
AMANDA L, MILLER  Notary Public - Notary Seal  St Charles County - State of Missouri	Signature of Complainant  7//22  Subscribed and sworn to before me this date (Day, month and Year)

Commission Number 13534807

My Commission Expires Oct 6, 2025

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EEOC Form 5 (11/09)

C D		
Charge of Discrimination	Charge Presented To:	Agency(ies) Charge No(s):
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act	EEOC	560-2022-01189
Statement and other information before completing this form.	FEPA	
Missouri Commission C	On Human Rights	and EEOC
State or local Agen		
Name (indicate Mr., Ms., Mrs.)	Home Phone	Year of Birth
Porsha L. Williams		
Street Address		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Co	ommittee, or State or Local Governmen	t Agency That I Believe Discriminated
Against Me or Others. (If more than two, list under PARTICULARS below.)	No. Employees, Members	n v
Name St. Louis Public Schools	501+ Employees	Phone No.
	301+ Employees	
Street Address		
801 N. 11th St,		
SAINT LOUIS, MO 63101 Name	No. Employees, Members	Phone No.
ivanic	No. Employees, Members	r none no.
Street Address City, State a	and ZIP Code	
Succi Address City, State a	ind Zii Code	
DISCRIMINATION BASED ON	DATE(S) DISCRIMINATION T	OOK PLACE
	T. F. A	<b>T</b>
D 1' '	Earliest 09/26/2021	Latest 10/16/2021
Religion	09/20/2021	10/10/2021
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):	2 1 2015 117 11	1 00 1 0 1 16
I am a practicing Christian who was employed by the above referenced employ 2021. I was rehired on February 14, 2022. My current position is Instruction.	yer from August 2016, until I was di al Care Aide.In September 2021. m	scharged effective on October 16, v employer implemented a policy
requiring employees to take a COVID-19 vaccine. My sincerely held religious	s beliefs prevent me from taking a C	OVID-19 vaccine. On September
24, 2021, I requested a religious exemption. My request was denied. Thereaf absence. I was subsequently terminated effective on October 16, 2021, in lieu of		
on February 14, 2022, but I was not paid backpay. Based on the above stated re	easons, I believe I was discriminated	against on the basis of my religion
in violation of Title VII of the Civil Rights Act of 1964, as amended.		
	NOTARY _ When necessary for State 11	ocal Agency Requirements
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in	NOTARY – When necessary for State and I	осы Agency Kequirements
the processing of my charge in accordance with their procedures.	Lower or affirm that I have good 411	nove charge and that it is two to the 1
I declare under penalty of perjury that the above is true and correct.	of my knowledge, information and bel	bove charge and that it is true to the best ief.
Digitally Signed By: Porsha L. Williams	SIGNATURE OF COMPLAINANT	
07/21/2022	CHECCHIED AND CWORN T	O DEEODE ME THE DATE
011212022	SUBSCRIBED AND SWORN To (month, day, year)	O BEFORE ME THIS DATE
Charoino Party Sionature		

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CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

- 1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).
- 2. AUTHORITY. 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
- **3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
- **4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
- 5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION. Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

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# Received FFQC June 28: 203/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge	Number	
FEPA EEOC	560-2022-02155	

Missou	ri Commission on	Human Rights ar	nd EEOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Brittany Weaver;		Date of Birth	Home To	elephone No. (Include Area Code)
Street Address	City, St	ate and Zip Code		County
Named below is the Employer, La State or Local Government Ag	bor Organization, gency who discrim	Employment Age	ency, App	prenticeship, Committee,
Name Saint Louis Public School District		No. of Employees/Mer 500+	mbers   Telep	phone No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street		City, State and Zip Co Saint Louis, MO 63		
Name Board of Education of the City of St. Louis		No. of Employees/Mer 500+	Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street		City, State and Zip Co Saint Louis, MO 63		
Cause of Discrimination based on (Check appropriate Race Color National Origin Religion Disability Retaliation	oriate box(es)) Sex Age Other (Spe			Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
I worked for the Board of Education of the Cand Family Community Specialist.  On August 24, 2021 the Board of Education requirement conflicts with my sincerely held statement outlining my beliefs including a statement districts in the State of Missouri have to continue working, such as frequent COVI continue to work in the district, however the engage in an interactive dialogue with me a other employees of the district who have red and the certified teachers were given statement employees such as myself were terminated. Accommodating teachers and employees best interests of all parties. The district appointment of the certified teachers and employees, which includes the control of the certified teachers and employees which included the control of the certified teachers and employees, which included the control of the certified teachers and employees which included the certified teachers and employees to teach and perform their duties request and left me unemployed which included the certified teachers.	adopted a policy #4624 religious beliefs. I appatement from my pastor on or about October 14 implemented procedure D testing. This indicate district has refused to end other people who had uested exemptions and of charges and suspend y allowing frequent testing and for the students to ided the Thanksgiving amption and issued blank	requiring employees lied for a religious exe The request for an exe to a religious exe to a religious to a request for an exe accommodation and commodations available and Christmas holidays et denials to all requested requested religious of the remployee commodations available and Christmas holidays et denials to all requested.	to take a CC mption inclu- exemption v olating boan es without Co modations. T exemptions roved for an ng hearings ting them we s and now r le that would refused to go sts in violation	DVID-19 Vaccination. This ding supplying a written was denied by the district.  d policy. DVID-19 vaccinations are able hat are available to allow me to he district has refused to I have spoken with numerous exemption.  to terminate them. Noncertified build be reasonable and in the eligious exemptions for the diallow the teachers and rant my religious exemption son and belief the district did not
I want this charge filed with both the I Commission on Human Rights. I will advise the address or telephone number and I will coopera processing of my charge in accordance with their I declare under penalty of perjury that the foregoing X Charging Party (Signature)	agencies if I change my ate fully with them in the procedures.  Ing is true and correct.	I swear or affirm that I hat the best of my knowledge	ave read the age, information	above charge and that it is true to and belief.
	State of St. Charle Commission	Missouri es County	before me to	nis date (Day, month and Year)  MCHR-27 (4-99) A

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statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on January 24, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Bullan 6/4/12

Charging Party (Signature)

NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Complainant

Date

6-24-27

to before me this date (Day, month and Year)

Notary Public, Notary Seal
State of Missouri
St. Charles County
Commission # 15386761
Commission Expires 09-30-2023

242

MCHR-27-2 AI

Case: 4:22-cv-00635-SRC Doc. #: 17-11

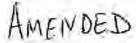
Filed: 09/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION



		# Number
	FEPA	E-11/21-53470
$\boxtimes$	EEOC	

Manne (Indiania Mar 1845	missouli Co	munasion on	Human Rights a		
Name (Indicate Mr., Ms., or Mrs.) Mr. Quinton Stewart;			Date of Birth	Hom	e Telephone No. (Include Area Code)
Street Address		City. S	ale and Zio Code		County
Named below is the Empl State or Local Govern	oyer, Labor ment Agenc	Organization, y who discrin	Employment Ag ninated against n	ency, A ne (if m	pprenticeship, Committee, ore than one list below).
Name Saint Louis Public School District			No. of Employees/Me 500+		elepnone No. (Include Area Code) 14-231-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 63		
Name Board of Education of the City of	St. Louis		No, of Employees/Me 500+		eleptione No. (Include Area Code) 14-231-3720
Street Address 801 N. 11th Street			City, State and Zip G Saint Louis, MO 63	ode 101	
National Origin R	olor eligion etaliation	Sex Age Other (Spe	rcify)		Date Discrimination took Place (Month, Day, Year) August 2020121-Present Continuing Action
numerous other employees of the The certified feachers were given employees such as myself were to The district reversed its policy and agreed in grant the certified feach available without undue cost to the Mant this charge filed with Commission on Human Rights. I will	ninated me on O souri have imple rking such as fre to work, however district who have statement of cherminated.  If withdrew the sers' religious exe district.  If both the EEOC advise the agency and the agency in the agency advise the agency in the service.	ictober 11, 2021 for mented procedure equent COVID teamer the district has proceed and other people requested exertarges and susperstatement of chargisemptions of twice and the Missouries of Charge my	es where teachers and ting. This indicates the afused to entertain supple who have request aptions and none of unded without pay pendes against the certifier pay week testing. The	d staff with at there a ich accomed ed religiou s were ap ling hearin d teachers is is an in	nout COVID-19 vaccinations are tre accommodations that are tmodations. The district has us exemptions. I have sooken with
siddress or telephone number and I processing of my charge in accordance declare under penalty of perjury that x x x x x x x x x x x x x x x x x x x	e with their proce	dures:  ue and correct.  Notary Sta Sign	X June of my knowled	ge, intonna	

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#: 471

The district offered me to be reinstated on January 29, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other em-ployees and now religious exemptions for the certified teachers and employees, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district initially refused to grant my religious exemption request and left me unemployed for over three months which included the Thanksgiving and Christmas holidays. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive distogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retailated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retailating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY = (When necessary to meet State and Local Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or attirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
t declare under penalty of perjury that the foregoing is true and correct.	X In the Standard Sta
KEVIN KASPI Notary Public, Not State of Miss St. Charles Co	

Commission # 15386761 Commission Expires 09-30-2023 2/2

MCHR-27-2 AT

Case: 4:22-cv-00635-SRC, Doc. #: 17-11, Filed: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

CHARGE OF DISCRIMINATION

Enter Charge	Number
FEPA EEOC	560-2022-02160

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Missouri Commiss	ion on Human Rights	and EEOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Jean Slaven;	Date of Birth	Home Telephone No. (Include Area Code)
Street Address	City, State and Zip Code	County
Named below is the Employer, Labor Organia State or Local Government Agency who		
Name Saint Louis Public School District	No. of Employees/N 500+	Members Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip ( Saint Louis, MO 6	
Name Board of Education of the City of St. Louis	No. of Employees/N 500+	Members Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip ( Saint Louis, MO 6	
Cause of Discrimination based on (Check appropriate box(es))  Race Color Se  National Origin Religion Ag  Disability Retaliation Ot		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
Other districts in the State of Missouri have implemented proontinue teaching such as frequent COVID testing. This in continue to teach, however the district has refused to enterinteractive dialogue with me and other people who have reemployees of the district who have requested exemptions. Accommodating teachers by allowing frequent testing rath all parties. The district has approved medical exemptions that would allow the teacher to teach and the students to be reason and belief, the district did not actually review my reviolation of our constitutional and statutory rights.  The district administration harassed its employees, including created a hostile working environment.	procedures where teachers we noticates that there are accommodations. Equested religious exemptions and none of us have been ager than terminating them wou for other teachers which indicarn, but the district has refused quest for religious exemption and myself, to get the vaccine Missouri  NOTARY – (When no	nmodations that are available to allow me to The district has refused to engage in an is. I have spoken with numerous other pproved for an exemption. uld be reasonable and in the best interests o icates that there are accommodations availal sed to grant any religious exemptions. Upor in and issued blanket denials to all request in
Commission on Human Rights. I will advise the agencies if I ch address or telephone number and I will cooperate fully with the processing of my charge in accordance with their procedures.	ange my in the I swear or affirm that the best of my knowle	I have read the above charge and that it is true to edge, information and belief.
St	X Signature of Comp	hainant 6-24-300 hainant 6-24-200 hainant 6-24-200 hainant 6-24-200 hainant 6-24-300 hainan

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#: 473

The Superintendent Kelvin Adams issued statement of charges against me in October 2021 indicating he was suspending me without pay and was seeking my termination with the board.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me in February 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missou Commission on Human Rights. I will advise the agencies if I change m	у
address or telephone number and I will cooperate fully with them in th processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)	x Signature of Cemplainent 6-24-203
Note	Synstyle and sworn to before me this date (Day, month and Year)
Con	State of Missouri St. Charles County Immission # 15386761 nission Expires 09-30-2023

Case: 4:22-cv-00635-SRC

Doc. #: 17-11

Filed: 09/08/22

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### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge I	Vumber
FEPA	120,14-05
X EEOC 5	60-1021-02583

State or Local Government Agency who discriminated against me (if more than one list below).  Name Saint Louis Public School District 500+ 500+ 500+ 500+ 500+ 500+ 500+ 500		Missouri C	omm	Ission on	Human Rights	and EE	EOC
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).  Normal Solint Louis Public School District  Street Address  Since Louis Public School District  Street Address  Giv, State and 20 Code Saint Louis, Mo 83101  Normal Solint Louis Public School District  Since Louis Public School District Include Area Code).  Since Louis Area (Include Area Code).  Since Loui					Date of Birth	H	ome Telephone No. (Include Area Code)
State or Local Government Agency who discriminated against me (if more than one list below).  Name Saint Louis Public School District  Side   No. of Employees/Members   Side   S	Street Address			City, Sta	ate and Zip Code		County
Name Saint Louis Public School District Sired Address Sort N. 11th Streat Streat Address Sort N. 11th Streat Sort M. 11th Streat Streat Address Sort N. 11th Streat Sort M. 11th Streat So	Named below is the	e Employer, Labo Government Agen	r Org	anization, ho discrim	Employment A	Agency, t me (if	Apprenticeship, Committee,
Size Address BOI N. 11th Street  Sol N. 10th Street  Nome BOard of Education of the City of St. Louis  Nome Board of Education of the City of St. Louis  Street Address City, State and Zip Code Saint Louis, MO 63101  Cause of Discrimination based on (Check appropriate box(as))  Race Color Race Race Religion R	Name				No. of Employees/		Telephone No. (Include Area Code)
Board of Education of the City of St. Louis  Street Address Street	Street Address 801 N. 11 <sup>th</sup> Street						
Street Address  801 N 11th Street  Cause of Discomination based on (Check appropriate box(ss))  Reace  Color  Reace  Color  Reace  Color  Reace  Color  Religion  Cother (Specify)  The Particulans Are (it additional space is needed, attach extra sheet(s))  I have been a teacher since 1985, I started with the Board of Education of the City of St. Louis & Saint Louis Public School District in 1994 as a special education teacher. The the district in 2007 and returned in 2015 as a special education teacher. The the district in 2007 and returned in 2015 as a special education teacher. The the district in 2007 and returned in 2015 as a special education teacher. This requirement conflicts with my sincerely held religious beliefs.  The district odd the employees that they could apply for a religious exemption and continue teaching by receiving tests on Monday and Thursday each week, indicating they were capable of accommodating employees request for religious exemption in a period of the employees that they are accommodating employees request for religious exemptions.  I applied for a religious exemption including supplying a written statement outlining my beliefs. The request for an exemption was denied by the district. I submitted additional documentation but the district refused to grant my request. The district did not grant any requests or religious exemptions.  Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations. The district has are fused to engage in an interactive dislogue with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us have been approved with as refused to engage in an interactive dislogue with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have	PLEATER AND AND ADDRESS OF THE PARTY OF THE	e City of St. Louis				Wembers	
Cause of Discrimination based on (Chack appropriate box(as))  Reace Color Sex (Month, Day, Year)  National Origin Religion Age Religion Other (Specify)  The Pariculate Are (If additional space is needed, ellicth extra sheet(s)). I have been a teacher since 1985. I started with the Board of Education of the City of St. Louis & Saint Louis Public School District in 1994 as a special education teacher. I left the district in 2007 and returned in 2015 as a special education teacher. The tight the district in 2007 and returned in 2015 as a special education teacher. The first edistrict of 2007 and returned in 2015 as a special education teacher. The first edistrict to a conflicts with my sincerely held religious beliefs.  The district told the employees that they could apply for a religious exemption and continue teaching by receiving tests on Monday and Thursday each week, indicating they were capable of accommodating employees request for religious exemptions.  Laphled for a religious exemptions.  The request for an exemption mount of the district refused to grant my request. The district do not grant any requests for religious exemptions.  Other districts in the Starte of Missouri have implemented pracedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue teaching such as requested exemptions and none of us have been approved for an exemption.  Accommodating teachers by allowing frequent testing rather than terministing them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other teachers which indicates that there are accommodations available meason and belief, the district and nation has approved medical exemptions for other teachers which indicates that there are accommodations a	Street Address 801 N. 11th Street						
I have been a leacher since 1985. I started with the Board of Education of the City of St Louis & Saint Louis Public-School District in 1994 as a special education teacher. I left the district in 2007 and returned in 2015 as a special education teacher. On August 24, 2021, the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  The district told the employees that they could apply for a religious exemption and continue teaching by receiving tests on Monday and Thursday each week, indicating they were capable of accommodating employees request for religious exemptions.  I applied for a religious exemption including supplying a written statement outlining my beliefs. The request for an exemption was denied by the district. I submitted additional documentation but the district refused to grant my request. The district did not grant any requests for religious exemptions.  Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to entagge in an interactive dialogue with me and other people who have requested religious exemptions. The district has refused to entagge in an interactive dialogue with me and other people who have requested religious exemptions. The district has refused to entagge in an interactive dialogue with me and other people who have requested religious exemptions. The district has refused to entagge in an interactive dialogue with me and other people who have requested religious exemptions. The district has refused to entagge in an interactive district who have requested exemptions for other teachers which indicates that there are accommodations available that we have represented to exemptions. The district did not accommodation exemptions i	Race National Origin Disability	Color Religion Retaliation		Sex Age Other (Spec	ify)		(Month, Day, Year) August 2021-Present
	and Thursday each wee I applied for a religious exception of the district. It is requests for religious exceptions are districts in the Star continue leaching such a continue to teach, hower interactive dialogue with employees of the district Accommodating teacher all parties. The district has would allow the lead reason and belief, the district administration of our constitution. The district administration created a hostile working.  I want this charge in Commission on Human Rigardress or telephone number of my charge in	k, indicating they were exemption including sup- submitted additional do- emptions. It of Missouri have implies frequent COVID testi- ver the district has refus- me and other people with who have requested et- as approved medical et- eter to teach and the strict did not actually re- tonal and statutory rights in harassed its employed and statutory rights in harassed its employed pervironment.  Itied with both the EEO onts. I will advise the agen- test and I will cooperate for accordance with their pro-	capable plying a cument lementing. The sed to exho have esting a compition when the cudents of t	e of accommon a written state awritten state attention but the ed procedurer is indicates from and none rather than takens for other to learn, but to request for a luding myself, the Missouri I change my them in the	dating employees ement outlining my district refused to a series where teachers what there are accordinations, eligious exemption of us have been a ministing them we eachers which indicated the district has refueligious exemption to get the vaccine NOTARY – (When many swear or affirm that	request for beliefs, grant my reduced from without CC mmodellor. The district from the real force of the real from	or religious exemptions. The request for an exemption was request. The district did not grant any DVID-19 vaccinations are able to as that are available to allow me to rict has refused to engage in an exemption. It is seen and in the best interests of there are accommodations available ant any religious exemptions. Upon and blanket denials to all request in ade me extremely distraught and a meet State and Local Requirements).
State of Missouri		St. C	Dacies.	County 15386761 pires 09-30-	2023 / 10	-2	MCHR-27 (4-99) A

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#: 475

The district suspended me on October 15, 2021, because they refused to grant my request for religious exemp-tion. They suspended me without pay on October 19, 2021. I spoke with Karla Dozler and she indicated the dis-trict would still not grant my religious exemption request.

The Superintendent Kelvin Adams issued statement of charges against me on October 19, 2021 indicating he was suspending me without pay and was seeking my termination with the board.

The district granted numerous medical exemptions but did not grant any religious exemptions. It learned that Charles Burton, who is the district's chief human resources officer, testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted.

The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me a letter dated January 24, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. The suspension by the district caused me financial strain. They did not pay me for the period of my suspension.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely hald religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended,

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	
address or telephone number and I will cooperate fully with them in the	
processing of my charge in accordance with their procedures.	

I declare under penalty of perjury that the foregoing is true and correct.

NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

areas a read postally of postally that the lylegolig is that and collect.

Charging Party (Signature)

-17-22 Signature of Complainant

KEVIN KASMEBribed and sworling before me this data (Day, month and Year)

Notary Public, Notary Sad State of Missouri St. Charles County Commission # 15386761 By Commission Expires 09-30-2023 Case: 4:22-cv-00635-SRCeived FEOC June 128, 25 iled: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge I	Number	
FEPA	T.(0.0000.001.T0	
⊠ EEOC	560-2022-02159	
		_

Page: 57 of 119 PageID

Misso	uri Commission on	Human Rights a	nd EEOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Rochelle Page;		Date of Birth	Home T	elephone No. (Include Area Code)
Street Address	City, St	ate and Zip Code	'	County
Named below is the Employer, I State or Local Government				
Name Saint Louis Public School District		No. of Employees/Me 500+		phone No. (Include Area Code) 231-3720
Street Address 801 N_ 11 <sup>th</sup> Street		City, State and Zip C Saint Louis, MO 63		
Name Board of Education of the City of St. Louis	s	No. of Employees/Me 500+		phone No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street		City, State and Zip C Saint Louis, MO 63		
Cause of Discrimination based on (Check app.  Race Color  National Origin Religion  Disability Retaliation  The Particulars Are (If additional space is need.)	Sex Age Other (Spe	cify)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
On August 24, 2021 the Board of Educati requirement conflicts with my sincerely he statement outlining my beliefs including a district harassed me to get the vaccination. The St. Louis Public Schools terminated of Other districts in the State of Missouri have to continue working, such as frequent CO continue to work in the district, however the engage in an interactive dialogue with me other employees of the district who have	eld religious beliefs. I app statement from my pasto n. They openly discussed me on October 16, 2021 for ve implemented procedure OVID testing. This indicate the district has refused to e and other people who has requested exemptions and	olied for a religious ex r. The request for an I my vaccination statu or allegedly violating be es where the employe es that there are accom- entertain such accom- ever requested religious d none of us were app	emption incluing exemption was with other separate policy. The sex without Commodations and attentions of the sex emptions or oved for an exemption of the sex emptions or oved for an exemption of the sex emptions or oved for an exemption of the sex emptions or oved for an exemption of the sex emptions or oved for an exemption of the sex emptions or oved for an exemption of the sex emptions of the sex em	iding supplying a written was denied by the district. The staff members.  OVID-19 vaccinations are able that are available to allow me to the district has refused to s. I have spoken with numerous exemption.
The certified teachers were given statemed employees such as myself were terminated. Accommodating teachers and employees best interests of all parties. The district a certified teachers and employees, which is employees to teach and perform their dutarequest and left me unemployed which in I want this charge filed with both the Commission on Human Rights. I will advise the	ed.  s by allowing frequent testi pproved medical exemption indicates that there are actives and for the students to cluded the Thanksgiving a e EEOC and the Missouri	ng rather than terminons for other employe commodations availablearn, but the district and Christmas holiday	ating them w es and now r ble that woul refused to g s. Upon rea	ould be reasonable and in the religious exemptions for the d allow the teachers and rant my religious exemption
address or telephone number and I will coop processing of my charge in accordance with the I declare under penalty of perjury that the forest	erate fully with them in the eir procedures.	I swear or affirm that I I the best of my knowled	lge, information	above charge and that it is true to n and belief.
Charging Party (Signature)	KEVIN KAS Notary Public, N State of Mi St. Charles Commission #	ssouri County		his date (Day, month and Year)

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#: 477

actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on January 24, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)  Date	Signature of Complainant
	VIN KASPER USubschberbandsworn to before me this date (Day, month and Year)
Sta St. C Commi	te of Missouri Charles County ssion # 15386761 Jon Expires 09-30-2023

## Case: 4:22-cv-00635-SReceived EEQC 191915, 2022 led: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge	e Number	
FEPA EEOC	560-2022-02254	

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Missouri Commission on	<b>Human Rights and El</b>	EOC
Name (Indicate Mr., Ms., or Mrs.) Mr. Richard Noble;	Date of Birth H	lome Telephone No. (Include Area Code)
Street Address City, St	tate and Zip Code	County
Named below is the Employer, Labor Organization, State or Local Government Agency who discrin		
Name Saint Louis Public School District	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of the City of St. Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101	
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other (Spe		Date Discrimination took Place (Month, Day. Year)  August 2021-Present  Continuing Action
Other districts in the State of Missouri have implemented procedure continue teaching such as frequent COVID testing. This indicates continue to teach, however the district has refused to entertain suc interactive dialogue with me and other people who have requested employees of the district who have requested exemptions and non-Accommodating teachers by allowing frequent testing rather than to all parties. The district has approved medical exemptions for other that would allow the teacher to teach and the students to learn, but reason and belief, the district did not actually review my request for violation of our constitutional and statutory rights.	that there are accommodation h accommodations. The dis religious exemptions. I have e of us have been approved erminating them would be re teachers which indicates the the district has refused to gi	ons that are available to allow me to trict has refused to engage in an ve spoken with numerous other for an exemption. easonable and in the best interests of at there are accommodations available rant any religious exemptions. Upon
The district administration harassed its employees, including mysel created a hostile working environment.	If, to get the vaccine. This m	nade me extremely distraught and
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	Cera	ad the above charge and that it is true to
A Commission Number 13534807 My Commission Expires Oct 6, 2025	X Lahund - Signature of Complainant 7 - 1 - 2 2	re me this date (Day, month and Year)  MCHR-27 (4-99)

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The district suspended me without pay on or about October 15, 2021, because they refused to grant my request for religious exemption. I spoke with Karla Dozier on or about October 15, 2021, and she indicated the district would still not grant my religious exemption request. The Superintendent Kelvin Adams issued statement of charges against me in October 2021 indicating he was suspending me without pay and was seeking my termination with the board. On or about October 21, 2021 I submitted a written response in response to the allegations.

On or about October 28, 2021 I was hand-delivered a Statement of Charges and Notice of Hearing. They scheduled a hearing in December 14, 2021 for the charges against me. On or about October 28, 2021, I submitted a signed waiver of administrative hearing. My hearing date was then subsequently changed to December 6, 2021 and a Findings of Fact, Conclusions of Law and Decision was ordered on May 12, 2022 terminating my employment. The decision wrongly stated that I had to fail to appear for the hearing on December 6.

Charles Burton, Chief Human Resources Officer for the District has stated in hearings for other teachers that the District granted fifteen medical exemptions, with eight additional still pending. Burton testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accomodiation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The District determined that it could give exemptions to persons seeking an exemption. The District determined that it was able to make the accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They did not pay me for the period of my suspension on or about October 15, 2021 until the date of termination. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and terminating my employment. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

Commission address or te	this charge filed with both the EEOC and the Miss on Human Rights. I will advise the agencies if I change elephone number and I will cooperate fully with them in f my charge in accordance with their procedures.	my fradeth
	AMANDA L. MILLER	X Signature of Complainant
	Notary Public - Notary Seal St Charles County - State of Missouri Commission Number 13534807 My Commission Expires Oct 6, 2025	

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
$\boxtimes$	EEOC	

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).  Named Saint Louis Public School District  Size Address  Size Addr	Missour	i Commission on	Human Rights and E	EOC
Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship, Committee, State or Local Government Agency who discriminated against me (if more than one list below).  Name Saint Louis Public School District Size Address South 11th Street South Of Education of the City of St. Louis South Address South 11th Street South Of Education of the City of St. Louis South Address South 11th Street Sou			Date of Birth	Home Telephone No. (Include Area Code)
State or Local Government Agency who discriminated against me (if more than one list below).  Name Saint Louis Public School District    South Address   City, State and Zip Code   Saint Louis, Mo Saint Loui	Street Address	City St	ate and Zip Code	County
Name Saint Louis Public School District Sitest Address Soft N. 11th Street Saint Louis Public School District Sitest Address Soft N. 11th Street Saint Louis MO 63101 Street Address Soft M. 11th Street Soft Employees/Members Soft				
Saint Louis, MÖ 63101   Name   No. of Employees/Members   Telephone No. (Include Area Code)	Name		No. of Employees/Members	Telephone No. (Include Area Code)
Board of Education of the City of St. Louis    Street Address				
Cause of Discrimination based on (Check appropriate box(es))  Race    Race   Color   Sex   August 2020121-Present			And the second s	
Race   Color   Sex   Mational Origin   Religion   Age   August 2020121-Present   Disability   Retaliation   Other (Specify)   Continuing Action   National Origin   Religion   Age   August 2020121-Present   Continuing Action   National Space is needed, attach extra sheet(s)):   worked for the Board of Education of the City of St. Louis & Saint Louis Public School District for approximately five years as a custodian.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs. I applied for a religious exemption including supplying a written statement outlining my beliefs including a statement from my pastor. The request for an exemption was denied by the district.  The St. Louis Public Schools terminated me on October 15, 2021 for allegedly violating board policy. Other districts in the State of Missouri have implemented procedures where teachers and staff without COVID-19 vaccinations are able to continue teaching and working such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to work, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialogue with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us were approved for an exemption.  The certified teachers were given statement of charges and suspended without pay pending hearings to terminate them. Noncertified employees such as myself were terminated.  The district reversed its policy and withdrew the statement of charges against the certified teachers in January 2022. The district has agreed to grant the certified teachers' religious exemptions of twice per week testing. This is an indication that the accommodation is available without undue cost to the district.  The district offered me to				
The Particulars Are (If additional space is needed, attach extra sheet(s)):  I worked for the Board of Education of the City of St. Louis & Saint Louis Public School District for approximately five years as a custodian.  On August 24, 2021 the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  I applied for a religious exemption including supplying a written statement outlining my beliefs including a statement from my pastor. The request for an exemption was denied by the district.  The St. Louis Public Schools terminated me on October 15, 2021 for allegedly violating board policy.  Other districts in the State of Missouri have implemented procedures where teachers and staff without COVID-19 vaccinations are able to continue teaching and working such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to work, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialogue with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us were approved for an exemption.  The certified teachers were given statement of charges and suspended without pay pending hearings to terminate them. Noncertified employees such as myself were terminated.  The district reversed its policy and withdrew the statement of charges against the certified teachers in January 2022. The district has agreed to grant the certified teachers' religious exemptions of twice per week testing. This is an indication that the accommodation is available without undue cost to the district.  The district offered me to be reinstated on January 29, 2022 and indicated they were granting my religious exemption. They are now Commission on Human Rights. I will advise the agencies if I change my address or telephone n	Cause of Discrimination based on (Check appropriate Color National Origin Religion	Sex Age	cify)	(Month, Day, Year) August 2020121-Present
Charging Party (Signature)	The St. Louis Public Schools terminated me Other districts in the State of Missouri have i able to continue teaching and working such a available to allow me to continue to work, ho refused to engage in an interactive dialogue numerous other employees of the district who The certified teachers were given statement employees such as myself were terminated. The district reversed its policy and withdrew agreed to grant the certified teachers' religio available without undue cost to the district.  The district offered me to be reinstated on James I want this charge filed with both the E Commission on Human Rights. I will advise the address or telephone number and I will coopera processing of my charge in accordance with their	on October 15, 2021 for mplemented procedure as frequent COVID test wever the district has right me and other peo o have requested exert of charges and suspend the statement of charges exemptions of twice anuary 29, 2022 and integration of the Missouri agencies if I change my te fully with them in the procedures.	es where teachers and staff ting. This indicates that the efused to entertain such ac ple who have requested rel inptions and none of us were ided without pay pending he es against the certified teac per week testing. This is a dicated they were granting  NOTARY – (When necessary  I swear or affirm that I have re the best of my knowledge, inf	without COVID-19 vaccinations are are are accommodations that are commodations. The district has igious exemptions. I have spoken with e approved for an exemption.  earings to terminate them. Noncertified there in January 2022. The district has an indication that the accommodation is my religious exemption. They are now to meet State and Local Requirements)  and the above charge and that it is true to domation and belief.

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allowing twice per week testing as an accommodation.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other em-ployees and now religious exemptions for the certified teachers and employees, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district initially refused to grant my religious exemption request and left me unemployed for over three months which included the Thanksgiving and Christmas holidays. Upon reason and be-lief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue work-ing. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY – (When necessary to meet State and Local Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
X Charging Party (Signature)  Light Signature Charging Party (Signature)  Light Signature Charging Party (Signature)	X Signature of Complainant 6-15-22
Notar	y Public, Notary Seal State of Missouri t. Charles County  State of Missouri The Charles County  MCHR-27-2 A

Commission # 15386761 Commission Expires 09-30-2023 Case: 4:22-cv-00835eigratEEQGoduly: 617022

Filed: 09/08/22

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge	Number	Ŧ
FEPA EEOC	560-2022-02252	

Wissouri Commis	sion on Human Rights	and EEOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Sharrone Miller;	Date of Birth	Home Telephone No. (Include Area Code)
Street Address	City, State and Zip Code	County
Named below is the Employer, Labor Organ State or Local Government Agency who		
Name Saint Louis Public School District	No. of Employees/N 500+	Members Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip ( Saint Louis, MO 6	
Name Board of Education of the City of St. Louis	No. of Employees/N 500+	Members Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip of Saint Louis, MO 6	
National Origin Religion	t. Louis & Saint Louis Public Solicy #4624 requiring employe	
I applied for a religious exemption including supplying a of the request for an exemption was denied by the district. Other districts in the State of Missouri have implemented continue teaching such as frequent COVID testing. This continue to teach, however the district has refused to entinteractive dialogue with me and other people who have employees of the district who have requested exemption Accommodating teachers by allowing frequent testing ratiall parties. The district has approved medical exemption that would allow the teacher to teach and the students to reason and belief, the district did not actually review my violation of our constitutional and statutory rights.	The district did not grant any did not grant and not grant accommodations. The requested religious exemptions and none of us have been appeared their than terminating them would for other teachers which indicate learn, but the district has refusively exemption of the religious exemption.	requests for religious exemptions.  without COVID-19 vaccinations are able to a modations that are available to allow me to a district has refused to engage in an as. I have spoken with numerous other approved for an exemption.  uld be reasonable and in the best interests of cates that there are accommodations available sed to grant any religious exemptions. Upon and issued blanket denials to all request in
I complained to my Principal that the actions of the district including myself, to get the vaccine. This made me extremely a large filed with both the EEOC and the Commission on Human Rights. I will advise the agencies if I caddress or telephone number and I will cooperate fully with the processing of my charge in accordance with their procedures.	e Missouri change my hem in the	ecessary to meet State and Local Requirements)  I have read the above charge and that it is true to
I declare under penalty of perjury that the foregoing is true and	correct.	edge, information and belief.

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#: 483

The district suspended me without pay on or about October 15, 2021, because they refused to grant my request for religious exemption. I spoke with Karla Dozier on or about October 15, 2021, and she indicated the district would still not grant my religious exemption request. The Superintendent Kelvin Adams issued statement of charges against me in October 2021 indicating he was suspending me without pay and was seeking my termination with the board.

They scheduled a hearing in December 2021 for the charges against me, however, the hearing kept getting postponed until June 2022. Charles Burton, Chief Human Resources Officer for the District has stated in hearings for other teachers that the District granted fifteen medical exemptions, with eight additional still pending. Burton testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accomodiation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The District determined that it could give exemptions to persons seeking an exemption. The District determined that it was able to make the accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. They did not pay me for the period of my suspension.

In January 2022 I returned to work. On or about February 9, 2022 I was informed by my principal that I was supposed to go downtown to HR to have a meeting that same day on an alleged charge that I gave a student chocolate. My principal then informed me that due to the weather that HR was closing early. I therefore did not go to the meeting believing it was cancelled. My principal then called me later that evening to tell me that I was supposed to have been at the meeting and now I was supposed to appear for the meeting at 8 am that next day. I was given charge paperwork at that meeting. I was placed on paid leave pending the investigation. That was from February to April. I then received the three statement of charges related to the chocolate allegation, an insubordination charge and the failure to get vaccination charge. I believe the charges were in retaliation for me not being vaccinated and requesting a religious exemption to the vaccination policy

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me in February 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	Madelle		
I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)  AMANDA L. MILLER Notary Public - Notary Seal St Charles County - State of Missouri	Subscribed and sworn to before me this date (Day, month and Year)		

Commission Number 13534807

My Commission Expires Oct 6, 2025

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Doc. #: 17-11

Filed: 09/08/22

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#: 484



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
X	EEOC	
	LLOO	

Missouri Commission on	Human Rights and E	EOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Jamie McDaniel;	Date of Birth	Home Telephone No. (Include Area Code)	
Street Address City, S	State and Zip Code	County	
Named below is the Employer, Labor Organization State or Local Government Agency who discrir	, Employment Agency minated against me (ii	y, Apprenticeship, Committee, f more than one list below).	
Name Saint Louis Public School District	No. of Employees/Members	Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 63101		
Name Board of Education of the City of St. Louis	No. of Employees/Members 500+	Employees/Members Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101		
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other (Spe	ecify)	Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action	
requirement conflicts with my sincerely held religious beliefs. I ap statement outlining my beliefs including a statement from my pasto. The St. Louis Public Schools terminated me on or about October 2 Other districts in the State of Missouri have implemented procedur to continue working, such as frequent COVID testing. This indicate continue to work in the district, however the district has refused to engage in an interactive dialogue with me and other people who have remployees of the district who have requested exemptions and The certified teachers were given statement of charges and suspensemployees such as myself were terminated.  Accommodating teachers and employees by allowing frequent test best interests of all parties. The district approved medical exemptions and employees, which indicates that there are accommodated.	or. The request for an exemple, 2021 for allegedly violating where the employees with the state that there are accommodenterial such accommodation are requested religious exemple and none of us were approved and without pay pending hearing rather than terminating the commodations available the	nption was denied by the district.  Ing board policy.  Hout COVID-19 vaccinations are able ations that are available to allow me to ions. The district has refused to inptions. I have spoken with numerous if for an exemption.  The district has refused to inputions. I have spoken with numerous if for an exemption.  The district has refused to inputions in the input of	
employees to teach and perform their duties and for the students to request and left me unemployed which included the Thanksgiving actually review my request for religious exemption and issued blan	o learn, but the district refuse and Christmas holidays. Up thet denials to all requests in	ed to grant my religious exemption on reason and belief the district did not violation of our constitutional and	
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		and the above charge and that it is true to primation and belief.	
Charging Party (Signature)  KEVIN KASHEBate Notary Public, Notary Set State of Missouri St. Charles County Commission # 15386761 My Commission Expires 09-30	X Signature of Complainant Subscribed and sworn to before	8/8/27 re me this date (Day, month and Year) MCHR-27 (4-99) AI	

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statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on or about February 22, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my			ements)
address or telephone number and I will processing of my charge in accordance		I swear or affirm that I have read the above charge and that it is the best of my knowledge, information and belief.	is true to
x Charging Party (Signature)	nul 8/18/22	x Signature of Complainant 8-18-22 Subscribes and sworn to before me this date (Day, month and	Year)
	State of Misso St. Charles Cou Commission # 153 My Commission Expires	ouri unty 386761 2 4 2 M	CHR-27-2 AI

Commission # 15386761 My Commission Expires 09-30-2023 Case: 4:22<sub>Revenue</sub> SPG<sub>une</sub> 29c<sub>2</sub>#: 486



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

_	
Enter Charg	e Number
FEPA	
EEOC	560-2021-02585

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Missouri Commission	on Human Rights and	EEOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Tashima M. Kinney	Date of Birth	Home Te	iephone No. (Include Area Code)
Street Address Cit	y, State and Zip Code		County
Named below is the Employer, Labor Organizati State or Local Government Agency who disc			
Name Saint Louis Public School District	No. of Employees/Memb	1 mars 5 1 2 2	none No. (Include Area Code) 231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 6310	1	
Name Board of Education of the City of St. Louis	No. of Employees/Memb		none No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 6310		0.0.20
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other ( The Particulars Are (If additional space is needed, attach extra sheet(s))	(Specify)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
requirement conflicts with my sincerely held religious beliefs. I denied by the district. I made a plea for reconsideration which not respond to my plea.  The St. Louis Public Schools terminated me on October 16, 20. Other districts in the State of Missouri have implemented proce to continue working, such as frequent COVID testing. This indicontinue to work in the district, however the district has refused engage in an interactive dialogue with me and other people whother employees of the district who have requested exemptions. The certified teachers were given statement of charges and sus employees such as myself were terminated.  The district reversed its prior exemption denials in January 202 testing to persons whom they previously denied. This is an indicatrict. The district offered me to be reinstated on January 24, are now allowing twice per week testing as an accommodation.	I sent directly to the board mediated and allegedly violating board adures where the employees cates that there are accommed to entertain such accommod have requested religious eres and none of us were approved a pended without pay pending 2 and agreed to grant the religion that the accommodation that the accommodation that the accommodation and indicated they were	rd policy, without CC odations th lations. Th xemptions, yed for an of the property gious exerty on is availate granting	October 14, 2021. They did OVID-19 vaccinations are able nat are available to allow me to le district has refused to I have spoken with numerous exemption. to terminate them. Noncertified imptions of twice per week able without undue cost to the
I want this charge filed with both the EEOC and the Misso Commission on Human Rights. I will advise the agencies if I change address or telephone number and I will cooperate fully with them in processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.	the I swear or affirm that I have the best of my knowledge,	e read the al	pove charge and that it is true to
State of St. Cha	Signature of Complainan  N KASIRISBribed and sworn to b  oit C, Notary Seal  of Missouri  riles County  on # 15386761  Expires 09-30-2023	6-	s date (Day, month and Year)  MCHR-27 (4-99) AI

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 68 of 119 PageID

#: 487

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district approved medical exemptions for other employees and now religious exemptions for the certified teachers and employees, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district refused to grant my religious exemption request and left me unemployed. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Charging Party (Signature)

29/2022 Date NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Complainant

Subscribed and sworn to before me this date (Day, month and Year)

KEVIN KASPER
Notary Public, Notary Seal
State of Missouri
St. Charles County
Commission # 15386761
Commission Expires 09-30-2023

Case: 4:22-cv-00635-SRC

Dreceit/edl. FEOIC Julinite28, 09208/22

#: 488





Enter Charge	e Number	
FEPA EEOC	560-2022-02162	

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#### CHARGE OF DISCRIMINATION

	Missouri C	ommission on	Human Rights	and EE	OC	
Name (Indicate Mr., Ms., or Mrs.) Mr. Marc Ingram;		Date of Birth	Ho	ome Telephone No. (Include Area Code)		
Street Address	City, S		ate and Zip Code		County	
					Apprenticeship, Committee	
Name Saint Louis Public School Dist	rict				Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip Saint Louis, MO			
Name Board of Education of the City	of St. Louis		No. of Employees/N 500+	lembers	mbers Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street			City, State and Zip Saint Louis, MO 6			
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other (Spe		Da (M) Au		Date Discrimination took Place (Month, Day, Year)  August 2021-Present		
employees of the district who Accommodating teachers by a all parties. The district has ap that would allow the teacher to reason and belief, the district violation of our constitutional a	have requested eallowing frequent opposed medical each and the stade and state of the stade and state of the stade and state of the sta	xemptions and none testing rather than to xemptions for other udents to learn, but view my request for s.	e of us have been ap erminating them wou teachers which indi- the district has refus religious exemption	oproved f ald be rea cates that sed to gra and issu	e spoken with numerous other for an exemption. asonable and in the best interests o it there are accommodations availal ant any religious exemptions. Upor ued blanket denials to all request in ade me extremely distraught and	
created a hostile working envi	ronment.					
I want this charge filed to Commission on Human Rights. I address or telephone number are processing of my charge in accompliance.	with both the EEO will advise the age ad I will cooperate t	C and the Missouri incles if I change my fully with them in the	NOTARY - (When no	cessary to	1 indicating he was suspending me to meet State and Local Requirements) and the above charge and that it is true to mation and helief	
x Mac a. Charging Party (Signature)			x Signature of Comp	a.	9-24-22	
onarying rany (orginature)			Notery Seel Missouri s County # 15386761		e me this date (Day, month and Year)  MCHR-27 (4-99)	

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 70 of 119 PageID

without pay and was seeking my termination with the board.

dually filed a charge of discrimination with the MCHR and EEOC in October 2021 regarding the discrimination against me by the district.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter dated January 13, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 28, 2022 in which they Indicated they were seeking to uphold the unpaid suspension against me. They did this in retallation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my			
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
I declare under penalty of periury that the foregoing is true and correct.	100 0		

Charging Party (Signature)

Signature of Complainant

KEVIN KASPE Bubscribed and sworn to before me this date (Day, month and Year)

Notary Public, Notary Seal State of Missouri St. Charles County Commission # 15386761 Commission Expires 09-30-2023

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MCHR-27-2 AI

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 71 of 119 PageID #: 490

EEOC Form 5 (11/09)

Charge of Discrimination	Charge Presented To:	Agency(ies) Charge No(s):
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act	1 Privacy Act EEOC <b>560-2022-0114</b> 2	
Statement and other information before completing this form.	FEPA	
Missouri Commission O	n Human Rights	and EEOC
State or local Agen		
Name (indicate Mr., Ms., Mrs.)	Home Phone	Year of Birth
Mrs. Detria L. HUDDLESTON		
Street Address		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Co Against Me or Others. ( <i>If more than two, list under PARTICULARS below.</i> )	mmittee, or State or Local Government	Agency That I Believe Discriminated
Name	No. Employees, Members	Phone No.
St. Louis Public Schools	501+ Employees	
Street Address		
2050 Allen Ave		
Saint Louis, MO 63104	N. F. J. W. J.	- Di Av
Name	No. Employees, Members	Phone No.
Street Address City, State a	and ZIP Code	
Silver reduces	and ZII Code	
DISCRIMINATION BASED ON	DATE(S) DISCRIMINATION TO	OOK PLACE
	Earliest	Latest
Religion	09/24/2021	10/16/2021
THE DADTICH ADC ADE (If additional paper is needed attack article shoot(a)).		
I am a practicing Christian who was employed by the above referenced employed apolicy requiring employees to take a COVID-19 vaccine. My sincerely hell September 22, 2021, I requested a religious exemption. My request was denied leave of absence. I was subsequently terminated effective on October 16, 2021 was rehired on February 14, 2022, but I was not paid backpay. Based on the above referenced employed apolicy requiring employees to take a COVID-19 vaccine. My sincerely hell september 22, 2021, I requested a religious exemption. My request was denied leave of absence. I was subsequently terminated effective on October 16, 2021 was rehired on February 14, 2022, but I was not paid backpay. Based on the above referenced employed to the sequence of the	Community Specialist.In September d religious beliefs prevent me from d. Thereafter, on October 13, 2021, I 21, in lieu of being granted my requebove stated reasons, I believe I was of	2021, my employer implemented taking a COVID-19 vaccine. On I was placed on an administrative ested religious accommodation. I
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise	NOTARY – When necessary for State and Lo	ocal Agency Requirements
the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		
I declare under penalty of perjury that the above is true and correct.	I swear or affirm that I have read the ab of my knowledge, information and beli- SIGNATURE OF COMPLAINANT	ove charge and that it is true to the best ef.
Digitally Signed By: Mrs. Detria L. HUDDLESTON	SIGNATURE OF COMPLAINAINI	
07/21/2022	SUBSCRIBED AND SWORN To (month, day, year)	O BEFORE ME THIS DATE
Charging Party Signature		

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 72 of 119 PageID

CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

- 1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).
- 2. AUTHORITY. 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
- **3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
- **4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
- 5. WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION. Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

Case: 4:22-cv-00635pSeGvedPocotc 1/1/13, 2051/20: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charge	Number
FEPA EEOC	560-2022-02259

Page: 73 of 119 PageID

Name (Indicate Mr. 47-		commission on	Date of Birth		
Name (Indicate Mr., Ms., o Mrs.Anne Gillespie	r IVIrs.)		Date of Birth	Home	Telephone No. (Include Area Code)
Street Address		City, St	ate and Zip Code		County
					pprenticeship, Committee, ore than one list below).
Name Saint Louis Public Scho	ol District		No. of Employees/N 500+	Control of the contro	lephone No. (Include Area Code) 4-231-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip of Saint Louis, MO of		
Name Board of Education of th	ne City of St. Louis		No. of Employees/N 500+		lephone No. (Include Area Code) 4-231-3720
Street Address 801 N. 11th Street			City, State and Zip ( Saint Louis, MO 6		
Cause of Discrimination ba Race National Origin Disability	sed on (Check appropriate Color Religion Retaliation	Sex Age Other (Spe	g(fy)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
denied by the district. T Other districts in the Sta continue teaching such continue to teach, howe interactive dialogue with employees of the district Accommodaling leacher all parties. The district in that would allow the teac reason and belief, the di violation of our constitut. I complained to human in The district administration created a hostile working	the district did not grant the of Missouri have imple as frequent COVID testiver the district has refusive the district has refusive the district has refusive the and other people with who have requested errors by allowing frequent that approved medical eacher to teach and the statrict did not actually resources that the action on harassed its employed environment.	any requests for reli- lemented procedure ing. This indicates to sed to entertain such who have requested exemptions and none testing rather than to exemptions for other udents to learn, but view my request for s. ans of the district were ees, including myself	gious exemptions. s where teachers we hat there are accommodations. religious exemptions of us have been appropriating them would the district has refusively religious exemptions. The district has refusively religious exemptions of the district has refusively religious exemptions. The discriminatory of the discriminatory.	ithout COVII modations to The district s. I have sp proved for a ald be reason cates that the sed to grant a and issued  This made	D-19 vaccinations are able to hat are available to allow me to has refused to engage in an ooken with numerous other an exemption. Inable and in the best interests of ere are accommodations available any religious exemptions. Upon blanket denials to all request in me extremely distraught and
Commission on Human Ri address or telephone num processing of my charge in I declare under penalty of p	ber and I will cooperate for accordance with their production of the foregoing is the foregoing in the foregoing in the foregoing is the foregoing in the foreg	ully with them in the cedures.	I swear or affirm that the best of my knowle X	dge, informati	e above charge and that it is true to igh and belief.
Charging Party (Signature	Not	KEVIN KASPER tary Public, Notar State of Missour St. Charles Count mmission # 1538 nmission Expires 0	ty 6761	of 2	e this date (Day, month and Year)  MCHR-27 (4-99) A

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 74 of 119 PageID

#: 493

The district suspended me without pay on or about October 15, 2021, because they refused to grant my request for religious exemption. I spoke with Karla Dozier on October 15, 2021, and she indicated the district would still not grant my religious exemption request.

The Superintendent Kelvin Adams issued statement of charges against me on or about October 15, 2021 Indicating he was suspending me without pay and was seeking my termination with the board.

They scheduled a hearing in December 2021 for the charges against me, however, when I arrived for the hearing they told me it had been postponed.

Charles Burton, Chief Human Resources Officer for the District has stated in hearings for other teachers that that the district granted fifteen medical exemptions, with eight additional still pending. Burton testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me an email and letter dated January 13, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor had my ability to teach my students. I missed months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions. Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

Commission on Human Rights. I will a		NOTARY – (When necessary to meet State and I	ocal Requirements)
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		I swear or affirm that I have read the above charg the best of my knowledge, information and belief.	e and that it is true to
X Charging Party (Signature)	KEVIN KASPER Notary Public, Notari State of Missou	Subscribed and sworn to before me this date (Da	28 - 22 y, month and Year)
	St. Charles Coun Commission # 1538 My Commission Expires 0	ty 2 of 2	MCHR-27-2 AI

Case: 4:22-cv-006358-65-100-10-12-11

Filed: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### Enter Charge Number

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**FEPA** 

EEOC

560-2022-02165

### **CHARGE OF DISCRIMINATION**

Missouri Commission o	n Human Rights and EE	EOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Donetta Dampier	Date of Birth He	ome Telephone No. (Include Area Code)
Wis. Donetta Dampier		County
Named below is the Employer, Labor Organization State or Local Government Agency who discri		
Name Saint Louis Public School District	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of the City of St. Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101	
Cause of Discrimination based on (Check appropriate box(es))  Race  Color  Sex	1	Date Discrimination took Place (Month, Day, Year)
National Origin Religion Age  Disability Retaliation Other (S	pecify)	August 2021-Present  Continuing Action
I worked for the Board of Education of the City of St. Louis & Sair Aid.  On August 24, 2021 the Board of Education adopted a policy #46 requirement conflicts with my sincerely held religious beliefs. I a statement outlining my beliefs including a statement from my pass. The St. Louis Public Schools terminated me on October 16, 2021 Other districts in the State of Missouri have implemented procedute continue working, such as frequent COVID testing. This indicates continue to work in the district, however the district has refused to engage in an interactive dialogue with me and other people who other employees of the district who have requested exemptions at The certified teachers were given statement of charges and suspemployees such as myself were terminated.  Accommodating teachers and employees by allowing frequent to best interests of all parties. The district approved medical exemptions are certified teachers and employees, which indicates that there are	624 requiring employees to take applied for a religious exemption of the request for an exemption. The request for an exemption of allegedly violating board pures where the employees with attest that there are accommodated have requested religious exemption of us were approved the ended without pay pending here esting rather than terminating the otions for other employees and accommodations available that	e a COVID-19 Vaccination. This in including supplying a written oftion was denied by the district.  olicy. Sout COVID-19 vaccinations are ablestions that are available to allow me to ons. The district has refused to aptions. I have spoken with numerous for an exemption.  arings to terminate them. Noncertified them would be reasonable and in the now religious exemptions for the twould allow the teachers and
employees to teach and perform their duties and for the students request and left me unemployed which included the Thanksgiving actually review my request for religious exemption and issued black.  I want this charge filed with both the EEOC and the Missou	g and Christmas holidays. Upo anket denials to all requests in NOTARY – (When necessary	on reason and belief the district did not
Commission on Human Rights. I will advise the agencies if I change m address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	ne	ad the above charge and that it is true to
I declare under penalty of perjury that the foregoing is true and correct.  **Condition** Charging Party (Signature)  **Condition** Charging Party (Signature)	X CONSTRUCTION X Signature of Complainant	MPW 6-23-22
Notary Public State of St. Charle	Missouri	re me this date (Day, month and Year)  MCHR-27 (4-99) A

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statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on January 24, 2022 and indicated they were granting my religious exemption. They are now allowing twice per week testing as an accommodation.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	1
I declare under penalty of perjury that the foregoing is true and correct.	

NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Charging Party (Signature)

6-23-22

Signature of Complainant

23.20

KEV Subsection and sworn to before me this date (Day, month and Year)

State of Missouri
St. Charles County
Commission # 15386761
My Commission Expires 09-30-2023

2 of 2

MCHR-27-2 AI

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Page: 77 of 119 PageID Received in EEOC 7/15/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### **CHARGE OF DISCRIMINATION**

Enter Charge	e Number	
FEPA		
■ EEOC     ■	560-2022-02309	

	Commission on Human Rights a	and EEOC
Name (Indicate Mr., Ms., or Mrs.) Mr. Andrew T. Craig	Date of Birth	Home Telephone No. (include Area Code)
Street Addréss	City, State and Zip Code	County
Named below is the Employer, Labo State or Local Government Ager		
Name Saint Louis Public School District	No. of Employees/M 500+	embers Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip C Saint Louis, MO 6	
Name Board of Education of the City of St. Louis	No. of Employees/M 500+	embers Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip C Saint Louis, MO 6	
Cause of Discrimination based on (Check appropriate Race Color National Origin Religion Disability Retaliation	e box(es))  Sex Age Other (Specify)	Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
requirement conflicts with my sincerely held relified to a religious exemption including supfor an exemption was denied by the district. If a exemption requests, what their criteria was, who process. The district refused to provide me and the district administration harassed its employed created a hostile working environment.	oplying written statements outlining by be asked for reasons for the denial and for a to reviewed the request for religious exen swers to my questions.	n outline of how the district evaluated religioun nptions and whether there was a review
The district suspended me on October 15, 202 suspended me without pay on October 18, 202 still not grant my religious exemption request. The Superintendent Kelvin Adams issued state without pay and was seeking my termination with the pay and was seeking my termination was seeking my termination with the pay and was seeking my termination which was seeking which which was seeking which was seeking which was seek	<ol> <li>because they refused to grant my requ</li> <li>I spoke with Karla Dozier on October</li> </ol>	est for religious exemption. They 18, 2021, and she indicated the district would
I dually filed a charge of discrimination with the discrimination against me by the district.	ith the board.	

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I had a hearing on the charges they brought against me in December, 2022 but the District never reached a deci-sion.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemp-tions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommoda-tion given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on March 11, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

$\boxtimes$ $_{I}$	want	this	charge	filed	with	both	the	EEOC	and	the	Missouri
Commis	sion o	on Hi	ıman Ri	ghts.	I will	advis	e th	e agend	ies if	I ch	ange my
			ne num harge in								em in the

NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

07-15-2022 Charging Party (Signature)

Signature of Complainally

KEVIN KASPER Subscribed and

worn to before me this date (Day, month and Year)

State of Missouri St. Charles County Commission # 15386761 My Commission Expires 09-30-2023

2 of 2

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS. COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION



	Charge Number
	FEPA E-11/21-53422
$\boxtimes$	EEOC 485-2022 -00137C

Mi	issouri Commission or	n Human Rights	and EEOC	6
Name (Indicate Mr., Ms., or Mrs.) Mr. Anthony Comparato		Date of Birth	Home 1	Telephone No. (Include Area Gode)
Straet Address	City, 8	State and Zip Code		County
Named below is the Employ State or Local Governme	er, Labor Organization ent Agency who discri	, Employment A minated against	gency, Ap	prenticeship, Committee re than one list below).
Name Saint Louis Public School District		No. of Employees/I	Viembers Tele	phone No. (Include Area Code) -231-3720
Street Address 801 N, 13th Street		City, State and Zip Saint Louis, MO	Code	· · · · · · · · · · · · · · · · · · ·
Name Board of Education of the City of St.	Louis	No. of Employees//		ephone No. (Include Area Gode) -231-3720
Street Address 801 N. 11th Street	<del></del>	City, State and Zip Saint Louis, MO	Code	
Cause of Discrimination based on (Chec) Race Color National Origin Religi Disability Retail	ion Sex  Age iation Other (Sp	ealfy)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
and Thursday each week, Indicating applied for a religious exemption incidented by the district. I submitted advectuests for religious exemptions. Other districts in the State of Missour continue teaching such as frequent Continue to feach, however the district interactive dialogue with me and other apployees of the district who have reaccommodating teachers by allowing all parties. The district has approved that would allow the teacher to teach reason and belief, the district did not violation of our constitutional and statement of the district administration harassed in the district administration	cluding supplying a written statiditional documentation but the implemented procedured that it is indicated to have refused to entertain success people who have requested exemptions and nor grequent testing rather than a medical exemptions for other and the students to learn, but actually review my request for tutory rights.  Its employees, including myseless the EEOC and the Missouries the Incident the I	atement outlining my the district refused to go that there are accome the accommodations the religious exemption the of us have been a terminating them won the district has refu- tor religious exemption or religious exemption of the district has refu- tor religious exemption eff, to get the vaccine	beliefs. The trant my requalithout COVID modefions the The district has I have spooted for arould be reasonated that the sed to grant at and issued but This made resident.	request for an exemption was set. The district did not grant and all vaccinations are able to at are available to allow me to as refused to engage in an exemption.  able and in the best interests of the are accommodations available by religious exemptions. Upon lanket denials to all request in
Commission on Human Rights, I will adv address or felephone number and I will processing of my charge in accordance w	cooperate fully with them in the rith their procedures.	-		above charge and that it is true to n and belief.
declare under pertally of perjury that the	foregoing is true and correct.	X Signature of Comp	2/2	6-17-22
Charging Party (Signature)	KEWIN	ASPER / G	1/ 6	his tate (Cay, month and Year)
	St. Charle	as County	14-2	MCHR-27 (4-99)

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#: 499

The district suspended me on October 15, 2021, because they refused to grant my request for religious exemp-tion. They suspended me without pay on October 19, 2021. I spoke with Karla Dozier and she indicated the dis-trict would still not grant my religious exemption request.

The Superintendent Kelvin Adams issued statement of charges against me on October 18, 2021 indicating he was suspending me without pay and was seeking my termination with the board.

I dually filed a charge of discrimination with the MCHR and EEOC on November 3, 2021 (No. 11/21 – 53422; 28E-2022-00137C) regarding the discrimination against rise by the district.

I was supposed to have a hearing on the charges they brought against me, but they kept postponing the hearing and it never happened.

The district granted numerous medical exemptions but did not grant any religious exemptions. It learned that Charles Eurton, who is the district's chief human resources officer, testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted.

The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been ap-proved for a religious exemption. The district determined that it could give exemptions persons seeking an ex-emption. The district determined that it was able to make the accommodation of twice per week testing for em-ployees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter dated January 12, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retallation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEQC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my eincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-glous beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

VII of the Civil Rights Act of 1964, each as amended			1.40	
Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will adopterate fully with them in the processing of my charge in accordance with their procedures.				
		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
X Charging Party (Signature)	and correct.	Signature of Complainant	6-17-2:	
Unalighted Falls (Associated)	Notary Pub	Subarrita dyalia awany lo Unfore me this		
	St. Cha	Missauri les County 1 1 5 3 6 7 8 1 Expires 09-30-2023	2 MCHR-27-2 A	

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Doc. #: 17-11

Filed: 09/08/22

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MISSOURI DEPARTME



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

AMENDED

Ente	Charge Number	
	FEPA E -03/22- 53895	
X	EEOC 27E-2022-06741	

This form is affected by the Privacy Act of 1974; see Privacy Act Statement before completing this form.

#: 500

	mission on Human F	and the second second second second	the state of the s
Name (Indicate Mr., Ms., or Mrs.) Mr. James Apple;	Date of Bi	ritir H	nme Telenhone No. (Include Area Code)
Street Address	City State and Zip C	Code	County
Named below is the Employer, Labor Of State or Local Government Agency	ganization, Employn who discriminated a	nent Agency gainst me (if	, Apprenticeship, Committee, more than one list below).
Name Saint Louis Public School District	No. of Emp 500+	ployees/Members	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street		and Zip Code ils, MO 63101	
Name Board of Education of the City of St. Louis	No. of Emp 500+	ployees/Members	Tsisphone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street		and Zip Code ils, MO 63101	
Cause of Discrimination based on (Check appropriate box.  Race Color  National Origin Religion	(es)) Sex Age		Date Discrimination took Place (Month, Day, Year) August 2021-Present
Disability Retaliation  The Particulars Are (if additional space is needed, attach a	Other (Specify)		Continuing Action
I applied for a religious exemption including supplying denied by the district. The district did not grant any Other districts in the State of Missouri have Implement continue leaching such as frequent COVID testing, continue to teach, however the district has refused to interactive dialogue with me and other people who hapployees of the district who have requested exemployees of the district who have requested exemplating teachers by allowing frequent testing all parties. The district has approved medical exemptant would allow the teacher to teach and the student reason and belief, the district did not actually review violation of our constitutional and statutory rights.  The district administration harassed its employees, in	requests for religious exemented procedures where teal This indicates that there are a centertain such accommod ave requested religious exemples and none of us have grather than terminating that to learn, but the district him request for religious exemples.	ptions, achers without Control of accommodation of accommodation of the control o	DVID-19 vaccinations are able to ns that are available to allow me to trict has refused to engage in an e spoken with numerous other for an exemption asonable and in the best interests of it there are accommodations available ant any religious exemptions. Upon ued blanket denials to all request in
created a hostile working environment.			
The Superintendent Kelvin Adams issued statement  I want this charge filed with both the EEOC an  Commission on Human Rights I will advise the agencies	d the Missouri If I change my	When necessary t	f indicating he was suspending me o meet State and Local Requirements)
address or telephone nilmber and I will cooperate fully w processing of my charge in accordance with their procedur. I dealare under penalty of perjury that the foregoing is true.	es, the best of m	firm Ihat I have rea iy knowledge, infor	d the above charge and that it is true to mation and belief

Commission # 15386761 My Commission Expires 09-30-2023 Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 82 of 119 PageID

without pay and was seeking my termination with the board.

I dually filed a charge of discrimination with the MCHR and EEOC in March 2022 (E-04/22-53895; 28E-2022-00741) regarding the discrimination against me by the district.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter dated January 12, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on March 11, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog. as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including the filing of the charge of discrimination with the MCHR & EEOC

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate Impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has falled to hire, suspended, terminated, threatened to terminate, asked to resign, falled to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights 1 will advise the agencles if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under cenalty of penjury that the foregoing is true and correct.

Charging Party (Signature)

NOTARY - (When necessary to meet State and Local Requirements)

swear or affirm that I have read the above charge and that it is true to ille best of my knowledge, information and belief

Signature of Complaining

KEVIN Bulgarised and swom to sefore me this date (Day, month and Year)

Notary Public, Notary Seal State of Missouri St. Charles County

Commission # 15388761

242 My Commission Expires 09-30-2023

MCHR-27-2 A)

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### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charg	e Number
FEPA EEOC	560-2022-02341

Missouri Commission on	Human Rights and El	EOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Alice Crockett	Date of Birth H	ome Telephone No. (Include Area Code)
Street Address City. St	ate and Zip Code	County
Named below is the Employer, Labor Organization, State or Local Government Agency who discrim		
Name Saint Louis Public School District	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street	City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of the City of St. Louis	No. of Employees/Members 500+	Telephone No. (Include Ārea Code) 314-231-3720
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101	
National Origin  Disability  Retaliation  Other (Spe The Particulars Are (If additional space is needed, attach extra sheet(s)): I have worked for the Board of Education of the City of St. Louis & scertified teacher in the district. On August 24, 2021 the Board of Education adopted a policy #4624 requirement conflicts with my sincerely held religious beliefs.  applied for a religious exemption including supplying written stater for an exemption was denied by the district. I asked for reasons for exemption requests, what their criteria was, who reviewed the requirement districts in the State of Missouri have implemented procedure continue teaching such as frequent COVID testing. This indicates to continue to teach, however the district has refused to entertain such interactive dialog with me and other people who have requested responses of the district who have requested exemptions and note aspoke at a board of education meeting on October 12, 2021 regard to amend their COVID policy. I indicated that frequent testing was a vaccinated and discussed that other districts have adopted frequents and continued to the continuent testing was a vaccinated and discussed that other districts have adopted frequents and continued to the continuent testing was a vaccinated and discussed that other districts have adopted frequents and their COVID policy. I indicated that frequent testing was a vaccinated and discussed that other districts have adopted frequents and their covidence of the district which are contrary to the teachers by allowing frequent testing rather than terminating them we will be a charge of discrimination with the EEOC on November 8, 20, 2021 in which he indicated that the district was suspending medicated a charge of discrimination with the EEOC on November 8, 20	Saint Louis Public School Distance of the denial and for an outline est for religious exemptions as where teachers without Contact there are accommodation accommodations. The distance of us have been approved a ding myself and other employ a viable alternative to terminate testing of non vacionated simple would be reasonable and in the dime a "Statement of Charge without pay and that he was	myself and my pastor. The request a of how the district evaluated religious and whether their was a review OVID-19 vaccinations are able to ans that are available to allow me to trict has refused to engage in an appoked with numerous other for an exemption eyees of the district to seek the district ation of employees who were not taff. I also addressed the staffing funding guidelines. Accommodating the best interests of all parties, es and Notike of Hearing* on October recommending to the board that I be
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.		ad the above charge and that it is true to rmation and belief.
Charging Party (Signature) Date	Subscribed and sworn to befor	e me this date (Day, month and Year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 84 of 119 PageID

#. 503

They scheduled a hearing in December 2021 for my charges, however, they postponed it and it was never held. Charles Burton, Chief Human Resources Officer for the District has stated that the district granted fifteen medical exemptions, with eight additional still pending. Burton testified that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me an email and letter dated January 7, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor had my ability to teach my students. I missed months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including filing a charge of discrimination with the EEOC and/or MCHR.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my			
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
I declare under penalty of perjury that the foregoing is true and correct.  x Duri B Crubbit 7/12/22 Charging Party (Signature) Date	x Min B. Crockett Signature of Complainant		

Subscribed and swom to before me this date (Day, month and Year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 85 of 119 PageID

# MISSOURI NOTARIAL CERTIFICATE (JURAT)

State of Mis County and	souri or City of <u>St. Lovis</u>		
Subscribed	and affirmed before me this 12 day o	of July	, 20 <u><i>2</i>2</u> .
[Seal]	ALYSSA K. FAKES	alyson	K. Jakes [Notary Public]
	Notary Public, Notary Seal State of Missouri St. Charles County Commission # 21404174	/	[Notary Public]

Case: 4:22-cv-00635-SRC

Doc. #: 17-11 Filed: 09/08/22 Page: 86 of 119 PageID



#### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	er Charge Number	
	FEPA	
H	W-242	
$\Delta$	EEQC	

Missouri Commission on	Human Rights and	EEOC
Name (Indicate Mr., Ms., or Mrs.) Ms. Naomi Davis	Date of Birth	Home Telephone No. (Include Area Code)
	ate and Zip Code	County
Named below is the Employer, Labor Organization, State or Local Government Agency who discrim		
Name Saint Louis Public School District	No. of Employees/Membe 500+	rs Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11" Street	City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of the City of St. Louis	No. of Employees/Membe 500+	rs Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street	City. State and Zip Code Saint Louis, MO 63101	
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age Disability Retaliation Other (Specific Particulars Are (If additional space is needed, attach extra sheet(s)): I have been a teacher since 2015. I have worked for the Board of E		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
District since 2015. I am a tenured certified teacher in the district. On August 24, 2021 the Board of Education adopted a policy #4624 requirement conflicts with my sincerely held religious beliefs. I applied for a religious exemption including supplying a written stated denied by the district.  Other districts in the State of Missouri have implemented procedure continue teaching such as frequent COVID testing. This indicates to continue to teach, however the district has refused to entertain such interactive dialog with me and other people who have requested relemployees of the district who have requested exemptions and none teachers by allowing frequent testing rather than terminating them with the Superintendent of Schools for the district, Kelvin Adams, issue 19, 2021 in which he indicated that the district was suspending me discharged from my employment with the St. Louis Public Schools.	ement outlining my beliefe es where teachers without that there are accommoda a accommodations. The of ligious exemptions. I have of us have been approve would be reasonable and d me a "Statement of Cha without pay and that he w	s. The request for an exemption was COVID-19 vaccinations are able to ations that are available to allow me to district has refused to engage in an exemption. Accommodating in the best interests of all parties.
I filed a charge of discrimination with the EEOC on November 22,20 Charles Burton, Chief Human Resources Officer has stated that the still pending. He stated that there were "a couple hundred" request accommodation given to persons who sought medical exemptions	e district granted fifteen m is for religious exemptions	edical exemptions, with eight additional and zero of which were granted. The
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	Dessiro Leigh	rep to meet State and Local Requirements)  County  read the above charge and that it is true to nformation and belief.
I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)  Date	x <u>Haven</u> — Signature of Complainant	Omena San
Thursday. This would be the same accommodation given to pers	Subscribed and sworn to be	efore me this date (Day, month and Year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 87 of 119 PageID

district determined that it could give exemptions persons seeking an exemption. The district de-termined that it was able to make the accommodation of twice per week testing for employees. It cannot there-fore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions. Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR and/or EEQC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	Dessica Laine Dela Crum
I declare under penalty of perjury that the foregoing is true and correct.  X Charging Party (Signature)  Date	x Magne Omage Nove— Signature of Complainant  12, July, 2022 Subscribed and sworn to before me this date (Day, month and Year)



## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS. COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charg	е Иитраг
□ FERA ® EEDC	560-2022-02335

		Commission on	Human Rights	and EEO	C	L,
Name (Indiana Mr. 185) Ma.Majalia (Elijan)	ar Mes.i		Dale of Birth	Harri	e Teleppone No (Instade Area Guide)	1
SimeLarings		5)(9/3)	ate one IIp Gode		Controls	
					oprenticeship: Committee are than one list below)	
Martie Seint Laura Frabilic Sch	op) District	*	NO. of Employeen Mi 500		Telephono ya, (finklade ritela Guiur) 14-231-5720	Ī
Biret address : BOT N: 11º Biret			Smirt Louis, IMD R			I
Name Epard in Education of	the City of St. Lauis		MO, OX EMPROYAGEAN SAID II		Telephone (Io. Hindlade Arga Cude) 14-231-8720	1
Smeet Address   BBY N. 1107 Street			Saint Louis MO 6			
Rec:     Notional Origin     Deathle)     The Particulars Are Iffia	Dissection (Great spicion)  Color  Religion  Retalistion  distinal spece is meaned of Education of the Cit	□ Sei □ Age □ Oliver (Spec uitech uvon shee(s))	~~		August 2021-Rinsent  Soningling Accent	
l applied for a religious denied by the district. Other districts in the Scontinue leaching auct continue to teach, how interactive dialogite will amployees of the district districts of all paracommodating leach treat interests of all paracommodations availate ligious exemptions, blanket deniels to ell in The district administrationaled a hostile work. The Superintendent Kwithout pay anti-was a I duality filed a charge discrimination against. Charles Burton, Chief still pending. He state	tale of Missouri have in as frequent COVID to aver the district has re in me and other people or who have requested ors and employees by thes. The district has a able that would allow if Door reason and belie equests in violation of a floor harassed its employer Adams is sued a seking my termination with it me by the district.	upplying written states inplemented procedure siling. This indicates fused to entertain suc- who have requested exemptions and non- allowing frequent test ipproved medical exem- ippro	es where teachers with a there are accommodations. religious exemptions of us have been aping rather than terminations for other toactually review my requisitionary rights. It to got the vaccinus against me on Octobe to the district granted fifte to for religious exempts for religious exempts.	Illingut COV modations The district in the district in the district in the district in but the uest for rel in 20, 2021 21 (No. 560 en medical blions and	s request for an exemption was  (13-19 vacanations are able to that are available to allow me to that are available to allow me to that refused to ongage in an spoken with numerous other an exemption if would be reasonable and in the hindicates that there are district has refused to grant any ligious exemption and issued  unit extremely distraught and indicating he was suspending me (1-2022-00738) regarding the resemptions, with eight additional zero of which were granted,	r
Commission on Human address of telephone nu processing of my charge.	Fights, I will advise the a more and I will coonerab in accordance with their property that the horsystem of the control of th	genoies if ( ahange my stully with them in the mocedures:	K MULATU.	Oge Informa		- T

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#: 508

The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it was able to make the accommodation of twice per week testing for em-ployees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to leach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

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SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely field religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punifive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retallated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Misson Commission on Human Rights. I will advise the agencies if I change r		
eddress or telephone number and I will cooperate fully with them in to processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief	
declare under penalty of penury that the foregoing is true and correct.  ** Markin Clubbs 07/5-22	x Marsha (1) Son 7-15-22	
Charging Party (Signature) Date KEVIN	supposes and sadm to before me this date (Day, month and Year).	

State of Missouri St. Charles County Commission # 15386761

Commission Expires 09-30-2023

Zof2

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Page: 90 of 119 PageID Received in EEOC 7/21/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Ente	r Charge	e Number	
_	FEPA		
$\boxtimes$	EEOC	560-2022-02387	

Missouri Commission on	Human Rights and E	EOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Hollis Flannery	Date of Birth	dome Telephone No. (Include Area Code)	
Street Address City, St	ate and Zip Code	County	
Named below is the Employer, Labor Organization, State or Local Government Agency who discrim	Employment Agency	, Apprenticeship, Committee, more than one list below).	
Name Saint Louis Public School District	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101		
Name Board of Education of the City of St. Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101		
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retaliation Other (Spe	cify)	Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action	
District since 2020.  On August 24, 2021 the Board of Education adopted a policy #4624 requirement conflicts with my sincerely held religious beliefs. I applied for a religious exemption including supplying written stater for an exemption was denied by the district.  Other districts in the State of Missouri have implemented procedure continue teaching such as frequent COVID testing. This indicates to continue to teach, however the district has refused to entertain such interactive dialogue with me and other people who have requested employees of the district who have requested exemptions and none Accommodating teachers and employees by allowing frequent testi best interests of all parties. The district has approved medical exemplations available that would allow the teacher to teach an religious exemptions. Upon reason and belief the district did not accommodation to all request in violation of our constitutional and state of the district administration harassed its employees, including myself created a hostile working environment.  The Superintendent of Schools for the district, Kelvin Adams, issued.	es where teachers without Chat there are accommodation accommodations. The distreligious exemptions. I have of us have been approved in grather than terminating the ptions for other teachers will the students to learn, but the students to learn, but the students.  If, to get the vaccine. This metal in the statement of Charger and the statement of Charger are without the statement of the st	OVID-19 vaccinations are able to ons that are available to allow me to strict has refused to engage in an overspecies with numerous other for an exemption. The mem would be reasonable and in the which indicates that there are the district has refused to grant any religious exemption and issued the made me extremely distraught and the sand Notice of Hearing" on October	
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  X Hole London Toldon Told	I swear or affirm that I have re the best of my knowledge, info	ad the above charge and that it is true to ormation and belief.  2022  re me this date (Day, month and Year)  MCHR-27 (4-99) Al	

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 91 of 119 PageID

20, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on December 13, 2021 (No. 560-2022-00736) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and puni-tive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have com-plained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the foregoing is true and correct.  X Local Language T-21-22 Charging Party (Signature)	x Jellix Gannery Signature of Complainant July 21, 2022

AMANDA L. MILLER
Notary Public - Notary Seal
St Charles County - State of Missouri
Commission Number 13534807
My Commission Expires Oct 6, 2025

Subscribed and sworn to before me this date (Day, month and Year)

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### **CHARGE OF DISCRIMINATION**

Ente	r Charge Number
	FEPA
$\boxtimes$	r Charge Number FEPA EEOC <i>560-</i> 2022- <i>0159</i> 4

Mis	souri Commission o	n Human Rights ar	id EEOC		
Name (Indicate Mr., Ms., or Mrs.) Ms. Sharon Hardnett		Date of Birth	Home Te	lephone No. (Include Area Code)	
Street Address	City.	State and Zip Code		County	
Named below is the Employe State or Local Governmen	r, Labor Organization nt Agency who discri	, Employment Age minated against m	ency, App le (if more	renticeship, Committee, than one list below).	
Name Saint Louis Public School District		No, of Employees/Mer 500+		hone No. (Include Area Code) 231-3720	
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Co Saint Louis, MO 63			
Name Board of Education of the City of St. L	ouis	No. of Employees/Mer 500+		ers Telephone No. (Include Area Code) 314-231-3720	
Street Address 801 N. 11th Street		City, State and Zip Co Saint Louis, MO 63			
Cause of Discrimination based on (Check Race Color National Origin Religio Disability Retalia The Particulars Are (If additional space is	n Sex- n Age tion Other (Sp	pecify)		Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Action	
requirement conflicts with my sincerel The district told the employees that the and Thursday each week, indicating the I applied for a religious exemption includenied by the district. The district did Other districts in the State of Missouri continue teaching such as frequent Cocontinue to teach, however the district interactive dialogue with me and other employees of the district who have reaccommodating teachers by allowing all parties. The district has approved that would allow the teacher to teach areason and belief, the district did not a violation of our constitutional and state. The district administration harassed its created a hostille working environment. The district suspended me on Octobe.  I want this charge filed with both commission on Human Rights. I will adviaddress or telephone number and I will oprocessing of my charge in accordance will declare under panalty of perjury that the following Party (Signature).	ey could apply for a religious new were capable of accoming supplying a written stand grant any requests for make implemented procedure. This indicates has refused to entertain surpeople who have requested exemptions and not frequent testing rather than medical exemptions for other and the students to learn, but it is employees, including mystates the agencies if I change mystate the agencies if I change mystate the improcedures.  The EEOC and the Missour se the agencies if I change mystate fully with them in the their procedures.	modating employees recatement outlining my be eligious exemptions. It is that there are accommodations. The religious exemptions are of us have been appreterminating them would be teachers which indicat the district has refused or religious exemption are religious exemption are ligious exemption. The district has refused or religious exemption are ligious exemptions. It is wear or affirm that I have best of my knowledge are ligious exemptions.	quest for religions. The resout COVID-1 odations that he district has I have spok roved for an interest that there is that there is to grant any not issued black. This made must be read the ange, information and interest that there is the interest is the	glous exemptions. Equest for an exemption was  19 vaccinations are able to t are available to allow me to s refused to engage in an en with numerous other exemption.  It is a commodations available by religious exemptions. Upon anket denials to all request in  Exemption.  They suspended  State and Local Requirements)  State and Local Requirements  bove charge and that it is true to and belief.	
	Notary Public, Nota State of Misso St. Charles Cou Commission # 153 My Commission Expires	uri nty 86761	42	MCHR-27 (4-99) A	

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me without pay on October 16, 2021. They scheduled a meeting with me on October 26, 2021. I spoke with Kar-la Dozier on October 26, 2021, and she indicated the district would still not grant my religious exemption request. I knew that they would seek my termination. I resigned my termination on October 26, 2021, because of the con-tinued harassment, hostile working environment and knowledge that they would terminate me if I did not resign.

The district changed its mind on January 24, 2022 and decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retailated against me for my seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about

their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.



I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary to meet State and Local Requirements)
		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
I declare under penalty of perjury that the f	oregoing is true and correct.	x Hawanant Signature of Complainant (1/21/27
Charging Party (Signature)	Notary Pub	KASPER TO THE SUBSCITUTE OF THE STATE OF THE
	St. Char	1 Missouri ries County on # 15386761 Expires 09-30-2023 MCHR-27-2

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#: **513**Received EEOC July 14, 2022



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charg	
FEPA EEOC	560-2022-02336

Missouri Commission on Human Rights and EEOC				
ame (Indicate Mr., Ms., or Mrs.)	Date of Birth Ho	ome Telephone No. (Include Area Code)		
	y State and Zin Code	County		
lamed below is the Employer, Labor Organization State or Local Government Agency who disc	on, Employment Agency, criminated against me (if	Apprenticeship, Committee more than one list below).		
lame Saint Louis Public School District	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720		
street Address	City, State and Zip Code Saint Louis, MO 63101			
lame Board of Education of the City of St. Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720		
Street Address Street No. 11th Street	City, State and Zip Code Saint Louis, MO 63101			
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age	(Specify)	Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action		
have worked for the Board of Education of the City of St. Lou certified teacher.  On August 24, 2021 the Board of Education adopted a policy frequirement conflicts with my sincerely held religious beliefs. I applied for a religious exemption including supplying written stor an exemption was denied by the district.	#4624 requiring employees to tak	e a COVID-19 Vaccination. This		
certified teacher.  On August 24, 2021 the Board of Education adopted a policy requirement conflicts with my sincerely held religious beliefs.  applied for a religious exemption including supplying written stor an exemption was denied by the district.  Other districts in the State of Missouri have implemented procedure teaching such as frequent COVID testing. This indicates the continue to teach, however the district has refused to entertain interactive dialogue with me and other people who have requested exemptions and	#4624 requiring employees to take statements outlining by beliefs by redures where teachers without C ates that there are accommodation such accommodations. The disested religious exemptions. I have the province of the testing rather than terminating the	e a COVID-19 Vaccination. This myself and my pastor. The request OVID-19 vaccinations are able to ons that are available to allow me to strict has refused to engage in an exemption.  The request of the reasonable and in the my would be reasonable and in the		
certified teacher.  On August 24, 2021 the Board of Education adopted a policy requirement conflicts with my sincerely held religious beliefs, applied for a religious exemption including supplying written stor an exemption was denied by the district.  Other districts in the State of Missouri have implemented proceeding such as frequent COVID testing. This indictionation to teach, however the district has refused to entertain interactive dialogue with me and other people who have requested exemptions and Accommodating teachers and employees by allowing frequent best interests of all parties. The district has approved medical accommodations available that would allow the teacher to tear religious exemptions. Upon reason and belief the district did in blanket denials to all request in violation of our constitutional at the district administration harassed its employees, including the	#4624 requiring employees to take statements outlining by beliefs by redures where teachers without Coates that there are accommodation such accommodations. The dispersed religious exemptions. I have been approved at testing rather than terminating till exemptions for other teachers which and the students to learn, but not actually review my request for and statutory rights.	e a COVID-19 Vaccination. This myself and my pastor. The request OVID-19 vaccinations are able to one that are available to allow me to strict has refused to engage in an ve spoken with numerous other for an exemption. The would be reasonable and in the which indicates that there are the district has refused to grant any religious exemption and issued made me extremely distraught and		
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Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 95 of 119 PageID

The Superintendent of Schools for the district, Kelvin Adams, issued me a "Statement of Charges and Notice of Hearing" on October 19, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on November 15, 2021 (No. 560-2022-00167) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemp-tions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommoda-tion given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of leaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions. Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filling of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-glous beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has falled to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missour Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the	111
processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the foregoing is true and correct.  X Harding Party (Signature)  Date	the best of my knowledge, information and belief.  **Mula J Hudto Signature of Complainant  7/8/2022
Notar	ELIZABETH REEPE Official Seal y Public - State of Illinois hission Expires Dec 20, 2025

## Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Received EEOC #: 151, 2022

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### MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

CHARGE OF DISCRIMINATION

Enter Charge	e Number
FEPA	560-2022-02340
X EEOC	

This form is affected by the Privacy Ac	t of 1974; see Privacy Act	Statement before	s completing t	his form.
Missouri Comm	ission on Human F	Rights and El	EOG	
Name (Indicate Mr., Ms., or Mrs.) Ms. Michelle Johnson	Date of Bi	Date of Birth Home Telephone No. (Include Area Coo		a No. (Include Area Code)
Street Address	City, State and Zip C	Code	Co	unh
Named below is the Employer, Labor Organizate or Local Government Agency wi				
Name Saint Louis Public School District	No. of Em 500÷	ployees/Members	Telephone N 314-231-37	o. (Include Area Code) 20
Street Address 801 N. 11 <sup>th</sup> Street		and Zip Code uis, MO 63101		
Name Board of Education of the City of St. Louis	No. of Em 500+	ployees/Members	Telephone N 314-231-37	o. (Include Area Code) 20
Street Address 801 N. 11th Street		and Zip Code		
Cause of Discrimination based on (Check appropriate box(es			(Monti	Discrimination took Place h, Day, Year)
National Origin   Religion   Disability   Retaliation	Age Other (Specify)		4-1	st 2020121-Present continuing Action
requirement conflicts with my sincerely held religious by applied for a religious exemption including supplying for an exemption was denied by the district.  Other districts in the State of Missouri have implement continue teaching such as frequent COVID testing. The continue to teach, however the district has refused to einteractive dialogue with me and other people who have employees of the district who have requested exemption Accommodating teachers and employees by allowing the best interests of all parties. The district has approved accommodations available that would allow the teacher religious exemptions. Upon reason and belief the district denials to all request in violation of our constitution. The district administration harassed its employees, incidented a hostile working environment.	written statements outling ad procedures where tea is indicates that there are intertain such accommon e requested religious ex- ons and none of us have requent testing rather the medical exemptions for a to teach and the stude ict did not actually revieu- itional and statutory right	achers without C re accommodation. The dis- detions. The dis- temptions. I have been approved an terminating the part teachers we write to learn, but I we my request for the commodation. This my Notar My Commodation.	OVID-19 vaccons that are autrict has refusive spoken with for an exemplem would be hich indicates the district has religious exercises of the control of the	cinations are able in valiable to allow me to ed to engage in an innumerous other tion. Teasonable and in the that there are is refused to grant any imption and issued  Lill mely distraught and e of Illinois. Aug 31, 2023
I want this charge filled with both the EEOC and Commission on Human Rights. I will advise the agencies if address or telephone number and I will cooperate fully with processing of my charge in accordance with their procedures I declare under penalty of perjury that the foregoing is true an	thom in the	Mayo	ad the above ch	narge and that it is true to
Charging Party (Signature)	Date	of Complainant	re me this date	(Day, month and Year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 97 of 119 PageID

The Superintendent of Schools for the district, Kelvin Adams, issued me a "Statement of Charges and Notice of Hearing" on October 20, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on November 15, 2021 (No. 560-2021-02640) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, or Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retalication for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retailed against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who compiain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

JOE MAYORAL III Official Seal Notary Public - State of Illinois My Commission Expires Aug 31, 2023

I want this charge filed with both the EEGC and the Mittouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	( + Mal
declare under penalty of perjury that the foregoing is true and correct.  Muchuse Sold 7/7/22  Charging Party (Signature)  Date	Subscribed and sworn to before me this date (Day, month and Year)

### Case: 4:22-cv-00685-5RVed EPOC#July7151 205 jed: 09/08/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

		-
Enter Charge	Number	
FEPA EEOC	560-2022-02277	

Page: 98 of 119 PageID

Missouri C	commission on	Human Rights and E		
Name (Indicate Mr., Ms., or Mrs.) Mr. Johnnie McCreary		Date of Birth Home Telephone No. (Include A		phone No. (Include Area Code)
Street Address	City, St	ate and Zip Code		County
				1
Named below is the Employer, Labo State or Local Government Ager	r Organization, ncy who discrim	Employment Agency inated against me (if	, Appre	nticeship, Committee, han one list below).
Name Saint Louis Public School District		No. of Employees/Members 500+	Telepho 314-23	ne No. (Include Area Code) 1-3720
Street Address 801 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101		
Name Board of Education of the City of St. Louis		No. of Employees/Members 500+	Telepho 314-23	ne No. (Include Area Code) 1-3720
Street Address 801 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101		
Cause of Discrimination based on (Check appropriate Race Color National Origin Religion Disability Retaliation	e box(es)) Sex Age Other (Spe		(A	ate Discrimination took Place  Month, Day, Year)  ugust 2020121-Present  Continuing Action
requirement conflicts with my sincerely held rel I applied for a religious exemption including surfor an exemption was denied by the district.  Other districts in the State of Missouri have Improntinue teaching such as frequent COVID test continue to teach, however the district has refulinteractive dialogue with me and other people wemployees of the district who have requested a Accommodating teachers and employees by all best interests of all parties. The district has approximately accommodations available that would allow the religious exemptions. Upon reason and belief blanket denials to all request in violation of our The district administration harassed its employed created a hostile working environment.	oplying written stater olemented procedure ting. This indicates to sed to entertain such who have requested exemptions and none lowing frequent testing proved medical exer teacher to teach and the district did not acconstitutional and state ees, including mysel	es where teachers without Chat there are accommodation accommodations. The distributions of us have been approved in grather than terminating the policy of the students to learn, but studily review my request for alutory rights.  In the get the vaccine. This makes the a "Statement of Charged me a "Statement of Charge	OVID-19 ons that a strict has i we spoker for an ex them woul which indic religious made me of	vaccinations are able to re available to allow me to efused to engage in an awith numerous other emption. It is that there are that there are exemption and issued extremely distraught and otice of Hearing" on October
I want this charge filed with both the EEC Commission on Human Rights. I will advise the age address or telephone number and I will cooperate processing of my charge in accordance with their processing in the charge in accordance with their processing of my charge in accordance with their processing in the charge in accordance with their processing of my charge in accordance with the foreign in the charge in accordance with the processing of my charge in accordance with the foreign in the charge in accordance with the foreign in the charge in accordance with the charge in the charge in the charge in accordance with the charge in accordance with the charge in the charge in accordance with the charge in accordance with the charge in the	OC and the Missouri encies if I change my fully with them in the ocedures.	NOTARY - (When necessary	to meet St	ate and Local Requirements)  ove charge and that it is true to
Charging Party (Signature)  AMANDA L.  Notary Public	Notary Seal	Signature of Complainant  The July J Subscribed and sworn to before	022 ore me this	date (Day, month and Year)
St Charles County - Commission Num My Commission Exp	State of Missouri			MCHR-27 (4-99)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 99 of 119 PageID

19, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on November 15, 2021 (No. 560-2022-00157) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missou
Commission on Human Rights. I will advise the agencies if I change m
address or telephone number and I will cooperate fully with them in the
processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Charging Party (Signature)

AMANDA L. MILLER
Notary Public - Notary Seal
St Charles County - State of Missouri
Commission Number 13534807
My Commission Expires Oct 6, 2025

NOTARY - (When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Complainant

ubscribed and sworn to before me this date (Day, month and Year)

Case: 4:22-cv-00635-SRC

PageID #: 519

Doc. #: 17-11 Filed: 09/08/22 RPage:id.0000fo16/91/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

#### CHARGE OF DISCRIMINATION

Enter Charge Number	
FEPA	
EEOC 560-2022-02076	

Missouri Commission on Human Rights and EEOC							
Name (Indicate Mr., Ms., or M Mrs.Tammy O'Connor	rs.)			Date of Birth	ome Te	elephone No. (Include Area Coc	le)
Street Address			City, Stat	te and Zip Code		County	
						renticeship, Committ e than one list below).	
Name Saint Louis Public School	District			No. of Employees/Members 500+		hone No. <i>(Include Area Code</i> 231-3720	<del>)</del> )
Street Address 801 N. 11 <sup>th</sup> Street				City, State and Zip Code Saint Louis, MO 63101			
Name Board of Education of the	City of St. Louis			No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720		<b>?</b> )
Street Address 801 N. 11th Street				City, State and Zip Code Saint Louis, MO 63101	•		
Cause of Discrimination based Race	d on (Check appropriate b	ox(es)	) Sex			Date Discrimination took Place (Month, Day, Year)	9
National Origin Disability	Religion Retaliation		Age Other (Special	ifv)		August 2021-Present  Continuing Action	
The Particulars Are (If additional space is needed, attach extra sheet(s)):  I have been a teacher since 2008. I have worked for the Board of Education of the City of St. Louis & Saint Louis Public School District since 2008.  On August 24, 2021, the Board of Education adopted a policy #4624 requiring employees to take a COVID-19 Vaccination. This requirement conflicts with my sincerely held religious beliefs.  The district told the employees that they could apply for a religious exemption and continue teaching by receiving tests on Monday and Thursday each week, indicating they were capable of accommodating employees request for religious exemptions. I applied for a religious exemption including supplying a written statement outlining my beliefs. The request for an exemption was denied by the district. The district did not grant any requests for religious exemptions.  Other districts in the State of Missouri have implemented procedures where teachers without COVID-19 vaccinations are able to continue teaching such as frequent COVID testing. This indicates that there are accommodations that are available to allow me to continue to teach, however the district has refused to entertain such accommodations. The district has refused to engage in an interactive dialogue with me and other people who have requested religious exemptions. I have spoken with numerous other employees of the district who have requested exemptions and none of us have been approved for an exemption. Accommodating teachers by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district has approved medical exemptions for other teachers which indicates that there are accommodations available that would allow the teacher to teach and the students to learn, but the district has refused to grant any religious exemptions. Upon reason and belief, the district did not actually review my request for religious exemption and issued blanket denials to all request in violation of our con					of able on n		
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  NOTARY – (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.							
x Charging Party (Signature)	Connact Tree foregoing is the	61	KEVIN K	Signature of Corribia mant	e me th	6/3/22 is date (Day, month and Year)	_
	My	Co	State of Mi St. Charles mmission #	Souri	6		99) AI

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 101 of 119 PageID #: 520

suspended me without pay on October 18, 2021. I spoke with Karla Dozier on October 18, 2021, and she indicated the district would still not grant my religious exemption request.

The Superintendent Kelvin Adams issued statement of charges against me on October 18, 2021 indicating he was suspending me without pay and was seeking my termination with the board.

I dually filed a charge of discrimination with the MCHR and EEOC on November 4, 2021 (No. 11/21 – 53427; 28E-2022-00143C) regarding the discrimination against me by the district.

I had a hearing on the charges they brought against me on December 16, 2022 in which evidence was taken. Charles Burton, Chief Human Resources Officer testified at the hearing.

Burton testified that the district granted fifteen medical exemptions, with eight additional still pending. He testi-fied that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter dated January 14, 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

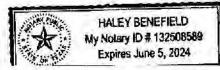
I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY - (When necessary to meet State and Local Requirements)		
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.		
x Jammy 6 Connor 6/3/2022	x Jammy O Conne Signature of Complainant		
Charging Party (Signature)  Dake VI  Notary Put  State	N KASPER  I Brub Broth and Sworn to before me this date (Day, month and Year) of Missouri		

Commission # 15386761 Commission Expires 09-30-2023 242

MCHR-27-2 AL

Page:	102 of 119
Enter Charg	ge Number
FEPA	560-2022-02337

	Missouri (	Commission on	Human Rights a	nd EEOC		
Name (Indicate Mr., Ms., o		i necessita	Date of Birth	Home To	elephone No. (Include Area Code	<del>i</del> )
Mrs. Shenicquel "Nikki" Sp Street Address	ous (	City, Sta	ate and Zip Code		County	
					renticeship, Committe e than one list below).	e,
Name Saint Louis Public Scho	ol District		No. of Employees/Me 500+		ohone No. <i>(Include Area Code,</i> 231-3720	1
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip Co Saint Louis, MO 63			
Name Board of Education of the	ne City of St. Louis	3	No. of Employees/Me 500+		phone No. (Include Area Code, 231-3720	
Street Address 801 N. 11th Street			City, State and Zip Co Saint Louis, MO 63			
Cause of Discrimination ba	sed on (Check appropriate	s box(es))	IDOTHI MID	diction in a min late	Date Discrimination took Place (Month, Day, Year)	
National Origin	Religion	Age			August 2021-Present	
Disability	Retaliation	Other (Spe	cify)		Continuing Action	
continue teaching such continue to teach, howe interactive dialogue with employees of the district Accommodating teacher best interests of all partiaccommodations availar eligious exemptions. Ublanket denials to all red	as frequent COVID test ver the district has reful to me and other people of the who have requested ears and employees by allies. The district has applied that would allow the lipon reason and belief quest in violation of our on harassed its employing environment.	ting. This indicates to sed to entertain such who have requested exemptions and none llowing frequent testi proved medical exempted teacher to teach and the district did not acconstitutional and standard	hat there are accommon accommodations. It religious exemptions. It of us have been apping rather than terminaptions for other teached the students to lear tually review my requality rights.  If, to get the vaccine.	nodations that The district hat I have spot proved for an ating them we hers which in n, but the distest for religion	ould be reasonable and in the	9
	ochools for the district,	Neivili Adams, Issue			t State and Local Requirements)	
I want this charge Commission on Human R address or telephone num processing of my charge in	iber and I will cooperate	ancies if I change my fully with them in the	daly but	have read the	above charge and that it is true to	
x Alexander penalty of a charging Party (Signature	ul Dol	s true and correct.    Strue and correct.   Strue and correct.   Date   Strue and correct.   Strue and correct.	Signature of Compla July 1446 Subscribed and sworm	2022"	Jaki 14th of July, 2672 his date (Day, month and Year)	



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20, 2021 in which he indicated that the district was suspending with 2022 and that he was recommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on November 23, 2021 (No. 560-2022-00178) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted lifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been suspended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did

not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination including the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

Since being attacked for my religious beliefs by the SLPS District, I have also been subjected to being personally and professionally ostracized by the community and my work environment. The district has intentionally persecuted me and other employees who refused to become vaccinated because of our religious beliefs and has made public statements about us intended to cause the public opinion to turn against us in an effort to bully us to take the vaccine. The district's actions have portrayed us in a negative light and caused the news media to allow the public to direct hostile and unsupported metoric towards us leading to a loss of public standing and reputation. The namative the district has spread is not of courageous educators standing up for freedom of choice and personal health. Instead, the district has portrayed us as rebellious agitators and of being uncaring of the students we have dedicated our lives to. Nothing could be further from the truth.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	MOTARY — (When necessary to meet State and Local Requirements)  I swear or affirm that I baye read the above charge and that it is true to the best of my knowledge, information and belief.
A Meningue April 14135  Charging Party (Signature)	Subscribed and sworn to before me this date (Day, month and Year)

\*

HALEY BENEFIELD My Notary ID # 132508589 Expires June 5, 2024 Case: 4:22-cv-00635-SRC

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Doc. #: 17-11 Filed: 09/08/22

Page: 104 of 119 Enter Charge Number FEPA.

EEOC



## MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Missouri Commission	on on Human Rights a	nd EEOC		
Name (Indicate Mr., Ms., or Mrs.) Ms. Danielle Watson (	Date of Birth	Home Te	lephone No. (Include Area Code)	
Street Address	City, State and Zip Code	tale and Zip Code County		
Named below is the Employer, Labor Organiz State or Local Government Agency who d				
Name Saint Louis Public School District	No. of Employees/Me 500+	mbers Telep	trone No. (Include Area Code) 231-3720	
Street Address 80.1 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101		
Name Board of Education of the City of St. Louis	No. of Employees/Me 500+		hane Na. (Inchide Area Code) 231-3720	
Street Address 801 N. 11th Street	City, State and Zip Co Saint Louis, MO 63		Уппо	
Cause of Discrimination based on (Check appropriate box(es))  Race Color Sex  National Origin Religion Age  Disability Retailation Oth			Date Discrimination took Place (Month, Day, Year)  August 2020121-Present  Continuing Addon	
I applied for a religious exemption including supplying writter for an exemption was denied by the district.  Other districts in the State of Missouri have implemented procontinue teaching such as frequent COVID testing. This indication is continue to teach, however the district has refused to entert interactive dialogue with me and other people who have regemployees of the district who have requested exemptions a Accommodating teachers and employees by allowing frequency interests of all parties. The district has approved medicaccommodations available that would allow the teacher to be religious exemptions. Upon reason and belief the district district district denials to all request in violation of our constitutions. The district administration harassed its employees, including created a hostile working environment.  The Superintendent of Schools for the district, Kelvin Adams.	cocedures where teachers will dicates that there are accommodations. To present religious exemptions and none of us have been appent tealing rather than terminated each and the students to lean did not actually review my requisit and statutory rights, or myself, to get the vaccine.	nout COVID- nodations that he district ha I have spok roved for an aling them wo hers which ind he but the dist est for religion This made mi	19 vaccinations are able to take available to allow me to a refused to engage in an en with numerous other exemption. For any line are that there are that there are that refused to grant any us exemption and issued a extremely distraught and	
I want this charge filed with both the EEOC and the M Commission on Human Rights. I will advise the agencies if I charaddress or telephone number and I will cooperate fully with their processing of my charge in accordance with their procedures.  I declare under penalty of penury that the foregoing is true and commissions.	nin the I swear or affirm that I the best of my knowled	ave read the a	boye charge and that it is true to	
Charging Party (Pignature)  AMANDA L. MILLER  Notary Public - Notary Se  Et Charles County - State of M  Commission Number 13534	Subscribed and swom	19 4	is date/(Day, month and Year)  MCHFe-ZI (4-99) AI	

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20, 2021 in which he indicated that the district was suspending me without pay and that he was recommending to the board that the discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on November 23, 2021 (No. 580-2022-00511) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemptions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 28, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retallation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my ballefs that would allow me to continue working, suspending me without pay, heressing me, creating a hostile working environment, and forcing me to resign. They have also retailed against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and puni-tive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who this district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retailated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY - (When necessary to meet State and Local Requirements)  I swear or affirm that I have read, the above charge and that it is true to the best of my knowledge, information and build.
Charging Party (Signature)  AMANDA L, MILLER Natary Sublic Netary Seal  St Charles County - State of Missouri Commission Number 13534807	Signature of Complainant  19 1 1 2 0 2 2  Subscribed and sworn (a before me this date (Day, month and Year)

My Commission Expires Oct 6 2025

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EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION	Charge		Agency(ies) Charge	
This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		FEPA	No(s):	
		EEOC	560-2022-00018	
MISSOURI COMMISSION	ON HUMA		and EEOC	
State or local Age				
Name (indicate Mr., Ms., Mrs.)		Home Phone	Year of Birth	
ANDREW CRAIG				
Street Address City, State	e and ZIP Code			
Named is the Employer, Labor Organization, Employment Agency, Appr That I Believe Discriminated Against Me or Others. ( <i>If more than two, I</i> .			cal Government Agency	
Name		No. Employees, Members	Phone No.	
SAINT LOUIS PUBLIC SCHOOLS		201 - 500		
Street Address City, State	e and ZIP Code			
810 NORTH 11TH STREET, SAINT LOUIS, MO 63	3101			
Name		No. Employees, Members	Phone No.	
Street Address City, State	e and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).)		DATE(S) DISCF	RIMINATION TOOK PLACE	
	1	Earliest		
RACE COLOR SEX X RELIGION	NATIONAL ORIG	O9-24-2	021 10-15-2021	
	NETIC INFORMATION			
OTHER (Specify)			CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):  I am a Christian. I was hired in 2016 as an Aviatio	n Vocation	al Tech Instruct	or. until my	
suspension on October 15, 2021.	vocacion		o., a	
During my employment, I had no disciplinary actions taken against me, I received				
outstanding performance reviews and perfect att				
submitted documentation, which included a letter	r from my c	hurch, for Relig	ious Exemption	
from taking the COVID-19 Vaccination. Annamari				
my exemption due to insufficient information for sincerely held religious exemption. My employer				
accommodation, as a result I have been suspende	d without p	pay until I recei	ve the COVID-19	
vaccine.				
10-29-2021: On September 22, 2021 I informed t	he school p	orincipal and hu	ıman resources	
department via email that I was concerned for the	e privacy of	my information	n and my safety,	
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number	NOTARY - When	necessary for State and	Local Agency Requirements	
and I will cooperate fully with them in the processing of my charge in				
accordance with their procedures.  I declare under penalty of perjury that the above is true and correct.			e above charge and that it , information and belief.	
, , , , ,	SIGNATURE OF C	•		
Digitally signed by Andrew Craig on 11-09-2021 06:12 PM EST	SUBSCRIBED AN ( <i>month, day, ye</i>	D SWORN TO BEFORE M	E THIS DATE	
	, , , , , , , , , , , , , , , , , , , ,	•		

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 107 of 119

PageID #: 526

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION	Charge Presented To:	Agency(ies) Charge No(s):
official building British at Act of 1074. Consequenced British at Act		

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

FEPA
X EEOC 560-2022-00018

#### **MISSOURI COMMISSION ON HUMAN RIGHTS**

and EEOC

State or local Agency, if any

as multiple staff had asked for my vaccination status while performing my job duties in the building. On August 31, 2021 an all staff email was sent out by a staff member at the school that referred to those without a vaccine as idiots with a lack of education and common sense. On September 22, 2021, I also asked the school principal and human resources department the following questions: What is the criteria that will be used to evaluate my request? Is there any reason my religious exemption request and accommodation would be denied? Those questions were sent to Ms. Annamaria Lu in Human Resources on September 23, 2021 with no response to those questions, Charles K, Burton, Chief Human Resources Officer replied on September 23, 2021 that he was in receipt of my request and that the district will treat the information provided as confidential and that each case is reviewed on its merits under the applicable law. Again no specific response to the questions I had asked. My request for a religious exemption was subsequently denied, On September 29, 2021 I emailed the school principal and Human Resources office requesting an appeal of their decision. I provided an attached document with comments of several nationally known Christian organizations and pastors which supported my religious objection stance. On September 30, 2021 Ms. Annamaria Lu sent an email stating that the district has completed review of the information which I had submitted. She stated that at this time their decision remains unchanged and is final. On October 1, 2021 I sent the school principal an email requesting that I wanted to make an internal complaint with the district for religious discrimination. On October 5, 2021 I received a response from the school principal who replied that she was told This is a decision of the District based on board policy. As such, there is no complaint that can be filed within SLPS for his complaint. On October 14, 2021 I received an email from Ms. Annamaria Lu that I was to report to Human Resources 801 N. 11th Street on Friday, October 15, 2021. This is a different address than my normal assigned work building. In addition, on October 14, 2021 I received an email that the Board of Education of the City of St. Louis approved a one-time \$750 bonus for every SLPS employee who has been fully vaccinated against Covid-19. On October 15, 2021 I received a letter from human resources at 801 N. 11th Street that I was to report back to the district office location on October 18, 2021, The letter stated that I was placed on administrative leave and that I would not be allowed on district property. The date of October 18, 2021 was the day the school had scheduled parent teacher conferences as well as a tour of my program with district and industry professionals. I had been told on October 13, 2021 that I should be available to answer questions for those members taking the tour but was then denied the opportunity to fulfill those duties. On October 22 an email was sent to Ms. Dozier, Director of Employer Relations at St. Louis Public Schools asking about my Sick and PTO Time Bank with no response as of October 29, 2021.

In addition, the balance of competing constitutional interests weight in favor of the rights of students ineligible to receive the vaccine.

I believe that I have been denied a religious accommodation and suspended due to my religious beliefs a Christian which is in violation of Title VII of the Civil Rights Act of 1964, as

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in	NOTARY - When necessary for State and Local Agency Requirements	
accordance with their procedures.	I swear or affirm that I have read the above charge and that it	
I declare under penalty of perjury that the above is true and correct.	is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
Digitally signed by Andrew Craig on 11-09-2021 06:12 PM EST	SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE ( <i>month, day, year</i> )	

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PageID #: 527

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION  This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.	Charge Presented To:	Agency(ies) Charge No(s):
	X EEOC	560-2022-00018
MISSOURI COMMISSION	ON HUMAN RIGHTS	and EEOC
State or local Ager	ncy, if any	
amended.		

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Digitally signed by Andrew Craig on 11-09-2021 06:12 PM EST

NOTARY - When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.
SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 109 of 119 PageID #: 528

CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

- 1. FORM NUMBER/TITLE/DATE. EEOC Form 5, Charge of Discrimination (11/09).
- **2. AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
- **3. PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
- **4. ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
- **5.** Whether Disclosure is Mandatory; Effect of Not Giving Information. Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

### **NOTICE OF NON-RETALIATION REQUIREMENTS**

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an

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investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

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Doc. #: 17-11 Filed: 09/08/22 Receivedin EFO(18/29/22



MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS

### CHARGE OF DISCRIMINATION

Enter Charge	Number	
FEPA		
EEOC	560-2021-02631	

This form is affected by the Privacy Act of 1974; see Privacy Act Statement before completing this form.

	Missouri (	Commission on	Human Rights a	nd EEOC	
Name (Indicate Mr., Ms., or Ms. Diana Mathieson	Mrs.)	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Date of Birth	Home T	elephone No. (Include Area Code)
Street Address		City, S	tate and Zip Code		County
					prenticeship, Committee, e than one list below).
Name Saint Louis Public School			No. of Employees/Me 500+	embers Tele	phone No. (Include Area Code) -231-3720
Street Address 801 N. 11 <sup>th</sup> Street			City, State and Zip C Saint Louis, MO 63		
Name Board of Education of th	e City of St. Louis		No. of Employees/Me 500∔		phone No. (Include Area Code) -231-3720
Street Address 801 N. 11th Street		····	City, State and Zip C Saint Louis, MO 63		
Cause of Discrimination bar Race National Origin Disability The Particulars Are (If addit	Color Religion Retaliation	Sex Age Other (Spi	ecify)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
for an exemption was deformed the state on tinue teaching such a continue to teach, however interactive dialogue with employees of the district Accommodating teacher best interests of all particular particular eligious exemptions. Up blanket denials to all require district administration created a hostile working.	te of Missouri have implies frequent COVID test over the district has refurme and other people with the model of the model	plemented procedur ting. This indicates used to entertain suc who have requested exemptions and non llowing frequent test proved medical exe teacher to teach a the district did not a constitutional and s ees, including myse	es where teachers wit that there are accommendations. I religious exemptions, e of us have been apping rather than termin mptions for other teach to the students to lear ctually review my requitatutory rights. If, to get the vaccine.	hout COVID- nodations the The district him. I have spooroved for an ating them with hers which in the district the district hers which in This made not the control of the	rould be reasonable and in the indicates that there are strict has refused to grant any ous exemption and issued ne extremely distraught and
I want this charge Commission on Human Rig address or telephone numl processing of my charge in	per and I will cooperate	encies if I change my fully with them in the	Con	have read the	above charge and that it is true to
x Charging Party (Signature)	AMANDA Notary Public St Charles County	L. MILLER Date C - Notary Seal (* State of Missouri		st202	his date (Day, month and Year)

My Commission Expires Oct 6, 2025

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November 2, 2021 in which he indicated that the district was suspending me without pay and that he was rec-ommending to the board that I be discharged from my employment with the St. Louis Public Schools.

I dually filed a charge of discrimination with the MCHR and EEOC on December 13, 2021 (No. 560-2022-00739) regarding the discrimination against me by the district.

Charles Burton, Chief Human Resources Officer has stated that the district granted fifteen medical exemptions, with eight additional still pending. He stated that there were "a couple hundred" requests for religious exemp-tions and zero of which were granted. The accommodation given to persons who sought medical exemptions was they were allowed to test twice per week, on Monday and Thursday. This would be the same accommoda-tion given to persons had they been approved for a religious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation of twice per week testing for employees. It cannot therefore say it will undergo undue hardship if it granted my accommodation of twice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had previously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemption and reinstated my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to teach my students. I missed approximately three months of teaching my students because of the district's discriminatory practices. They did not pay me for the period of my suspension.

Even though they granted my exemption they indicated they would issue new charges against me for not being vaccinated from October through January. They issued new charges against me on February 7, 2022 in which they indicated they were seeking to uphold the unpaid suspension against me. They did this in retaliation for my exercising my rights to religious freedom protected by the US and Missouri Constitutions, Title VII and the MHRA.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending me without pay, harassing me and creating a hostile working environment. They have also retaliated against me for my seeking an exemption and for my complaints of discrimination in-cluding the filing of the charge of discrimination with the MCHR & EEOC.

SLPS engaged in unlawful discrimination by refusing to grant an exemption for my sincerely held religious belief as required by the Title VII and the Missouri Human Rights Act.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the foregoing is true and correct.

Charging Party (Signature)

AMANDA L. MILLER otary Public - Notary Sea

St Charles County - State of Missouri Commission Number 13534807 Ay Commission Expires Oct 6, 2025

NOTARY\_(When necessary to meet State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Signature of Complainan

Subscribed and sworh to before me this date (Day, month and Year).



Doc. #: 17-11 Filed: 09/08/22 Page: 113 of 119 Case: 4:22-cv-0

PageID #: 532 CHARGE OF DISCRIMINATION

TFOC

Missouri Commi	ission on Human Rights and I	EEOC
kame (Indicate Mr., Ms., or Mrs.)	Date of Sirth	Hams Tulephane No. (Include Area Cridin)
Bireal Address	City, State and Zip Code:	County
Named below is the Employer, Labor Orga State or Local Government Agency wh	onization, Employment Agenc	y, Apprenticeship, Committee, If more than one list below).
Saint Louis Public School District	No. of Employees/Member 500+	
Street Address 801 N. 11" Street	City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of this City of St. Louis.	No. of Employues/Mombin 500+	Silentrinis No. (Include Area Gode) 314-231-3720
Sheet Address 801 N. 11th Street	City, State and Zip Code Saint Louis, MO 63101	
Cause of Discrimination based on (Christ appropriate Doxies)  Race Com  National Origin Religion  Disability Relations	Sex Age Other (Spacify)	(Date Discrimination took Place /Month Day Vest)  August 2021-Présent  Communig Action
Other districts in the State of Missouri have implement continue teaching such as frequent COVID testing. The continue to teach, however the district has refused to enforce the district has refused to enforce district who have requested exemples. Accommodating teachers and employees by allowing focus interests of all parties. The district has approved recommodations available that would allow the teacher religious exemptions. Upon reason and testic the definition for the district dentals to all matters in violation of our constitution for the district administration harassed its employees, and	is indicates that there are accommodal intertain such accommodations. The is a requested religious exemptions. I have and none of us have been approve frequent testing rather than lerminaling medical examplicins for other teachers in to teach and the students to learn, but did not actually review my request through and statutory rights.	ising that are available to allow me to listnot has refused to engage main ave spoken with numerous other and for an exemption.  Them would be reasonable and in the which indicates that there are at the district free refused to year supply state of the refused to year state of the refused to year.
created a hostile working covircement.		-
The Superintendent of Schools for the district, Kolvin A  I want this charge filed with both the EEOC and  Commission on Human Rights: I will advise the agencies if adureos or foliophone number and I will cooperate tutly with processing of my charge in accordance with their processing.	this Missellari I shange my men in the Leader of arron that Leader	ry to meet State and Local Hospilinoments)  Hond the above charge and that (Us have to
A Couraging Party (Signature)  18, 2021 in which his indicated that the district was so	Signature of Complament Support of Support o	TU 2022 strained the class (Day, month and Yang)

discharged from my employment with the St. Louis Public Schools.

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 114 of 119 I dually filed a charge of discomination with the MCLIR and EE Page D #: 533 regarding the discrimination against me by the district

Charles Burton, Chief Human Resources Officer has stated that the claric/ gravited litteen medical exemptions, with eight additional still pending. He stated that there were 'a couple hundred' requests for religious examp-lions and zero of which were granted. accommodation given to persons who sought medical exemptions was they were a lowed to less twice per week, on Monday and Thursday. This would be the same accommodation given to persons had they been approved for a ridigious exemption. The district determined that it could give exemptions persons seeking an exemption. The district determined that it was able to make the accommodation at twice per week losting for employees. It cannot therefore say it will undergo on the hardship if it granted my accommodation of lwice per week testing.

The district changed its mind in January 2022 and granted the requests of people who had proviously been sus-pended. They sent me a letter in January 2022 indicating they decided to grant my request for religious exemp-tion and resistand my employment. They are not contesting that my religious belief was sincerely held. My condition has not changed, nor has my ability to leach my students. I missed approximately three months of teaching my students because of the district a discriminatory practices. They did not pay me for the period of my suspension

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The district and board have discriminated against me because of my religious beliefs including religing to en-gage in interactive dialog as to possible accommodations of my beliefs that would allow me to continue working, suspending the without pay, harassing me, creating a hostile working environment, and forcing me to resign. They have also retained against me for my seeking an exemption and for my complaints of discrimination in-cluding the filling of the charge of discrimination with the MCHR & FEOC.

SuPS engaged in unlawful discrimination by refusing to grant an exemption for my ismostally held religious bolish as required by the Title Vill and the Missouri Human Rights Act.

The district and board have engaged in a pattern and pructice of discriminating against employees because of their intigious beliefs and of retaileding against persons who complain about such discrimination. The district and board lowe knowingly and intentionally discriminated against mu, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retalisted against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstallament, back pay, from pay, compensatory comages, stidutory damages, and publishe damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained accut the poard and district's policies which interfere with such beliefs, who the district has falled to him, suspended, terminated, threatened to terminate, asked to resign, tailed to promite or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missuuri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

> TAYLOR WEISS Notary Public - Notary Seal St Louis County - State of Missouri Commission Number 16025928 My Commission Expires Oct 11, 2025

I want this charge Red with both the EEOC and the Missouri Commission on Human Rights I will achise the agencies #1 change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures

I declare under penalty of parjury that the leveraleg is min and correct.

Charging Party (Signatum)

NOTARY - Dates necessary to much State and Local Renormants.

I swear or aprimitized have read the above coargo and that it is true to the best of my knowledge, information and ballet

Signature of Complament

Subverbed sort swom to below medites data (tlay, month and Yusu)

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### CHARGE OF DISCRIMINATION

Enter Charge Number	
FEPA	
EEOC	

	ssouri Commission on	Human Rights and	EEOC	
Name (Indicate Mr., Ms., or Mrs.) Ms. Saidia McDaniel; s			Home Te	elephone No. (Include Area Code)
Street Address	tate and Zip Code		County	
Named below is the Employe State or Local Governme	er, Labor Organization nt Agency who discrir	, Employment Agen ninated against me	cy, App (if more	renticeship, Committee, than one list below).
Name Saint Louis Public School District		No. of Employees/Member 500+		hone No. (Include Area Code) 231-3720
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Code Saint Louis, MO 63101		
Name Board of Education of the City of St. L	ouis	No. of Employees/Member 500+		hone No. (Include Area Code) 231-3720
Street Address 801 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101		
Cause of Discrimination based on (Check Race Color National Origin Religion	Sex Age	Date Discrimination too (Month, Day, Year)		
Disability Retalia	ation Other (Spe	ecify)		Continuing Action
statement outlining my beliefs including The St. Louis Public Schools sent me Other districts in the State of Missouri to continue working, such as frequent continue to work in the district, howevengage in an interactive dialogue with other employees of the district who has The certified teachers were given state employees such as myself were terminated.	a letter dated November 3, 2 have implemented procedure COVID testing. This indicate or the district has refused to a me and other people who have requested exemptions an ement of charges and suspended.	2021 indicating I was termines where the employees were that there are accommodentertain such accommodentertain such accommodenter approved in the control of the control o	nated. vithout CC dations the ations. The emptions. ed for an e hearings	DVID-19 vaccinations are able nat are available to allow me to ne district has refused to I have spoken with numerous exemption.  to terminate them. Noncertified
Accommodating teachers and employ best interests of all parties. The district certified teachers and employees, which employees to teach and perform their request and left me unemployed which actually review my request for religious	ct approved medical exemption indicates that there are activities and for the students to hincluded the Thanksgiving as exemption and issued blance.	ons for other employees a commodations available to learn, but the district refu and Christmas holidays. L ket denials to all requests	nd now re hat would sed to gra lpon reaso in violation	eligious exemptions for the allow the teachers and ant my religious exemption on and belief the district did not
I want this charge filed with both Commission on Human Rights. I will advis address or telephone number and I will or processing of my charge in accordance with	se the agencies if I change my coperate fully with them in the		read the at	pove charge and that it is true to
x ada Managing Party (Signature).	KEVIN KASPER Notary Public, Nota State of Misson	Signature of Complainant	N9 81	25/2022 s date (Day, month and Year)
	St. Charles Cou Commission # 153 My Commission Expires	nty 86761 1 1 0 2		MCHR-27 (4-99) A

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statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on or about January 24,2022 and indicated they were granting my religious exemption and offered to reinstate me on February 7, 2022. They are now allowing twice per week testing as an accommodation. They knowingly discriminated against me from September through February 7, 2022 by refusing to employ me even though there were reasonable accommodations the district could have used to employ me at de minimis cost.

The district and board have discriminated against me because of my religious beliefs including refusing to en-gage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue work-ing. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our reli-gious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory poli-cies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

NOTARY – (When necessary to meet State and Local Requirements)  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Sarbs Sibed and sworn to before me this date (Day, month and Year)	

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MCHR-27-2 AI

St. Charles County

Commission # 15386761

My Commission Expires 09-30-2023

Case: 4:22-cv-00635-SRC Doc. #: 17-11 Filed: 09/08/22 Page: 117 of 119 EEOG Form 5 (5/01) PageID #: 536 Agency(les) Charge No(s): Charge Presented Tol CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act FEPA E-Statement and other information before completing this form. EEOC Missouri Commission On Human Rights and EEOC State or local Agency, if any Home Phone (Inc.) Area Code) Date of BIRN Name (indicate Mr., Ms., Mrs.) Mr. Marc Ingram City, State and ZIP Code County Street Address Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more then two, list under PARTICULARS below.) No. Employees, Members Phone No. (Include Area Code) 15+ 314.231.3720 Saint Louis Public Schools City. State and ZIP Code Street Address Saint Louis, MO 63101 801 N. 11 Street DATE(S) DISCRIMINATION TOOK PLACE DISCRIMINATION BASED ON (Check appropriate box les). I NATIONAL ORIGIN 9/15/2021 RACE RELIGION OTHER (Specify below.) RETALIATION DISABILITY CONTINUING ACTION THE PARTICULARS ARE III additional babar is needed, attach extra sheet(s)): I began working for the Respondent in February of 2014. On 8/24/2021 a new policy made by the Respondent was that all employees needed to have COVID-19 vaccines by October 1511. I was told that if I was not vaccinated by then, I would be terminated, unless I had either a religious or medical exemption. I first applied for a religious accommodation on 9/14/2021, but I was denied on 9/15/2021. The second time I applied was on 9/22/2021. I expressed that my body was a temple, and could not damage that temple with the vaccine. I even submitted a letter from my pastor. This second request was also denied. I was told that I was denied because our students were not eligible for the vaccine, which is a lie. I believe I was denied a religious accommodation by the Respondent. 1) I applied for an accommodation to be exempt from the COVID-19 vaccine mandate on 9/14/2021 and 9/22/2021. I was denied (wice, with the first denial being on 9/15/2021. As remedy, I desire an end to the discrimination and anything else the Commission deems just and proper. NOTARY - When necessary for State and Local Agency Requirements I want this charge filed with both the EEOC and the State or local Agency, if any. will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I awear or affirm that I have read the above charge and that it is true to I declare under panalty of perjury that the above is thus and correct. the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE

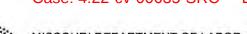
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2021 × Marca &

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MISSOURI DEPARTMENT OF LABOR AND INDUSTRIAL RELATIONS COMMISSION ON HUMAN RIGHTS

### Enter Charge Number **FEPA**

EEOC 560-2022-02862

### CHARGE OF DISCRIMINATION

Mi	issouri Commission on	Human Rights and El	EOC
Name (Indicate Mr., Ms., or Mrs.) Mr. Jeffery McCaw, Sr.;		Date of Birth	ome Telephone No. (Include Area Code)
Street Address	City, S	tate and Zip Code	County
			, Apprenticeship, Committee, more than one list below).
Name Saint Louis Public School District		No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11 <sup>th</sup> Street		City, State and Zip Code Saint Louis, MO 63101	
Name Board of Education of the City of St.	Louis	No. of Employees/Members 500+	Telephone No. (Include Area Code) 314-231-3720
Street Address 801 N. 11th Street		City, State and Zip Code Saint Louis, MO 63101	
Race Color Relig	National Origin          ☐ Religion        Age          Disability          ☐ Retaliation           ☐ Other (Specify)		Date Discrimination took Place (Month, Day, Year)  August 2021-Present  Continuing Action
all parties. The district has approved that would allow the teacher to teach reason and belief, the district did not violation of our constitutional and sta Other districts in the State of Missouries.	ing a statement from my pastor in have implemented procedure COVID testing. This indicates of has refused to entertain such people who have requested equested exemptions and non- g frequent testing rather than to medical exemptions for other and the students to learn, but actually review my request for tutory rights.	es where teachers without Co that there are accommodation h accommodations. The dist religious exemptions. I hav e of us have been approved erminating them would be re- teachers which indicates that the district has refused to gr r religious exemption and issu	OVID-19 vaccinations are able to ons that are available to allow me to trict has refused to engage in an exemption.  asonable and in the best interests of at there are accommodations available and rany religious exemptions. Upon used blanket denials to all request in an exemption.
to continue working, such as frequen continue to work in the district, howe	t COVID testing. This indicate ver the district has refused to e	es that there are accommoda entertain such accommodation ave requested religious exem	ntions that are available to allow me to ons. The district has refused to options. I have spoken with numerous
I want this charge filed with bot Commission on Human Rights. I will advaddress or telephone number and I will processing of my charge in accordance we I declare under penalty of perjury that the	vise the agencies if I change my cooperate fully with them in the vith their procedures.		ad the above charge and that it is true to
Charging Party (Signature)	KEVIN KASPER Notary Public, Notary S State of Missouri St. Charles County Commission # 1538676 My Commission Expires 09-3	1 1 12	e me this date (Day, month and Year)  MCHR-27 (4-99) AI

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other employees of the district who have requested exemptions and none of us were approved for an exemption.

The certified teachers such as myself were given statement of charges and suspended without pay pending hearings to terminate them. Noncertified employees such as were terminated.

The Superintendent Kelvin Adams issued statement of charges against me on or about October 15, 2021 indicating he was suspending me without pay and was seeking my termination with the board.

The district held a hearing on December 6, 2021 in which they sought my termination. The hearing officer never entered a decision. later learned that the district dismissed the charges. The actions of the district caused me anxiety and caused me loss of sleep.

Accommodating teachers and employees by allowing frequent testing rather than terminating them would be reasonable and in the best interests of all parties. The district approved medical exemptions for other employees and now religious exemptions for the certified teachers and employees, which indicates that there are accommodations available that would allow the teachers and employees to teach and perform their duties and for the students to learn, but the district refused to grant my religious exemption request and left me unemployed which included the Thanksgiving and Christmas holidays. Upon reason and belief the district did not actually review my request for religious exemption and issued blanket denials to all requests in violation of our constitutional and statutory rights.

The district reversed its prior exemption denials in January 2022 and agreed to grant the religious exemptions of twice per week testing to persons whom they previously denied. This is an indication that the accommodation is available without undue cost to the district. The district offered me to be reinstated on or about January 21,2022 and indicated they were granting my religious exemption and offered to reinstate me. They are now allowing twice per week testing as an accommodation. They knowingly discriminated against me from October through January 2022 by refusing to employ me even though there were reasonable accommodations the district could have used to employ me at de minimis cost. I requested to have a meeting with human resources seeking an explanation as to why the suspended me and offered to reinstate me but they refused to meet with me.

The district and board have discriminated against me because of my religious beliefs including refusing to engage in interactive dialogue as to possible accommodations of my beliefs that would allow me to continue working. They have also retaliated against me for my actions seeking an exemption.

The district and board have engaged in a pattern and practice of discriminating against employees because of their religious beliefs and of retaliating against persons who complain about such discrimination. The district and board have knowingly and intentionally discriminated against me, and other employees because of our religious beliefs resulting in both disparate treatment and disparate impact. The Board and District has retaliated against me and other persons seeking religious exemptions and for complaining about their discriminatory policies and practices.

I seek injunctive relief, reinstatement, back pay, front pay, compensatory damages, statutory damages, and punitive damages on behalf of myself and on behalf of a class of similarly situated persons comprising of persons with religious beliefs which are infringed upon by the district and board's policies, who have sought exemptions for the board's and district's policies which interfere with our sincerely held religious beliefs, who have complained about the board and district's policies which interfere with such beliefs, who the district has failed to hire, suspended, terminated, threatened to terminate, asked to resign, failed to promote or otherwise discriminated against, or retaliated against, including but not limited to claims under the Missouri Human Rights Act, and Titles VI and VII of the Civil Rights Act of 1964, each as amended.

I want this charge filed with both the EEOC and the Missouri Commission on Human Rights. I will advise the agencies if I change my	NOTARY – (When necessary to meet State and Local Requirements)	
address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
I declare under penalty of perjury that the foregoing is true and correct.  Charging Party (Signature)	Signature of Complainant 2-6-22	
KEVIN KASPER	Subscribed and sworn to before me this date (Day, month and Year)	
State of Missouri St. Charles County	MCHR-27-2 AI	

Commission # 15386761 My Commission Expires 09-30-2023

2 of 2